

**A.2 Part A/
Interim Status**



ACKNOWLEDGEMENT OF NOTIFICATION
OF HAZARDOUS WASTE ACTIVITY
(VERIFICATION)

This is to acknowledge that you have filed a Notification of Hazardous Waste Activity for the installation located at the address shown in the box below to comply with Section 3010 of the Resource Conservation and Recovery Act (RCRA). Your EPA Identification Number for that installation appears in the box below. The EPA Identification Number must be included on all shipping manifests for transporting hazardous wastes; on all Annual Reports that generators of hazardous waste, and owners and operators of hazardous waste treatment, storage and disposal facilities must file with EPA; on all applications for a Federal Hazardous Waste Permit; and other hazardous waste management reports and documents required under Subtitle C of RCRA.

EPA I.D. NUMBER

• ILT190010472 REACKNOWLEDGEMENT

ST CLAIR MFG CORP
120 25TH AVE
BELLWOOD

IL 60104

INSTALLATION ADDRESS

120 25TH AVE
BELLWOOD

IL 60104

U.S. ENVIRONMENTAL PROTECTION AGENCY
NOTIFICATION OF HAZARDOUS WASTE ACTIVITY

INSTALLATION'S EPA I.D. NO.

NAME OF INSTALLATION

II. INSTALLATION MAILING ADDRESS

III. LOCATION OF INSTALLATION

ILT180010472

PLEASE PLACE LABEL IN THIS SPACE

03115 AUG 25 80

INSTRUCTIONS: If you received a preprinted label, affix it in the space at left. If any of the information on the label is incorrect, draw a line through it and supply the correct information in the appropriate section below. If the label is complete and correct, leave Items I, II, and III below blank. If you did not receive a preprinted label, complete all items. "Installation" means a single site where hazardous waste is generated, treated, stored and/or disposed of, or a transporter's principal place of business. Please refer to the INSTRUCTIONS FOR FILING NOTIFICATION before completing this form. The information requested herein is required by law (Section 3010 of the Resource Conservation and Recovery Act).

FOR OFFICIAL USE ONLY

COMMENTS

INSTALLATION'S EPA I.D. NUMBER

APPROVED

DATE RECEIVED (yr., mo., & day)

ILT180010472

A

I. NAME OF INSTALLATION

ST. CLAIR MFG CORP

II. INSTALLATION MAILING ADDRESS

STREET OR P.O. BOX

120 25TH AVENUE

CITY OR TOWN

ST.

ZIP CODE

BELLVILLE

IL60104

III. LOCATION OF INSTALLATION

STREET OR ROUTE NUMBER

SAME

CITY OR TOWN

ST.

ZIP CODE

SAME

IV. INSTALLATION CONTACT

NAME AND TITLE (last, first, & job title)

PHONE NO. (area code & no.)

KAEBLER WILLIAM PLANT MANAGER

312-547-7522

V. OWNERSHIP

A. NAME OF INSTALLATION'S LEGAL OWNER

HRIESENDAFF EDWARD JR

B. TYPE OF OWNERSHIP (enter the appropriate letter into box)

VI. TYPE OF HAZARDOUS WASTE ACTIVITY (enter "X" in the appropriate box(es))

F = FEDERAL
M = NON-FEDERAL

A. GENERATION

B. TRANSPORTATION (complete item VII)

C. TREAT/STORE/DISPOSE

D. UNDERGROUND INJECTION

VII. MODE OF TRANSPORTATION (transporters only - enter "X" in the appropriate box(es))

A. AIR

B. RAIL

C. HIGHWAY

D. WATER

E. OTHER (specify):

VIII. FIRST OR SUBSEQUENT NOTIFICATION

Mark "X" in the appropriate box to indicate whether this is your installation's first notification of hazardous waste activity or a subsequent notification. If this is not your first notification, enter your Installation's EPA I.D. Number in the space provided below.

A. FIRST NOTIFICATION

B. SUBSEQUENT NOTIFICATION (complete item C)

C. INSTALLATION'S EPA I.D. NO.

ILT180010472

IX. DESCRIPTION OF HAZARDOUS WASTES

Please go to the reverse of this form and provide the requested information.

IX. DESCRIPTION OF HAZARDOUS WASTES (continued from front)

A. HAZARDOUS WASTES FROM NON-SPECIFIC SOURCES. Enter the four-digit number from 40 CFR Part 261.31 for each listed hazardous waste from non-specific sources your installation handles. Use additional sheets if necessary.

1	2	3	4	5	6
23 - 26	23 - 26	23 - 26	23 - 26	23 - 26	23 - 26
7	8	9	10	11	12
23 - 26	23 - 26	23 - 26	23 - 26	23 - 26	23 - 26

B. HAZARDOUS WASTES FROM SPECIFIC SOURCES. Enter the four-digit number from 40 CFR Part 261.32 for each listed hazardous waste from specific industrial sources your installation handles. Use additional sheets if necessary.

13	14	15	16	17	18
23 - 26	23 - 26	23 - 26	23 - 26	23 - 26	23 - 26
19	20	21	22	23	24
23 - 26	23 - 26	23 - 26	23 - 26	23 - 26	23 - 26
25	26	27	28	29	30
23 - 26	23 - 26	23 - 26	23 - 26	23 - 26	23 - 26

C. COMMERCIAL CHEMICAL PRODUCT HAZARDOUS WASTES. Enter the four-digit number from 40 CFR Part 261.33 for each chemical substance your installation handles which may be a hazardous waste. Use additional sheets if necessary.

31	32	33	34	35	36
23 - 26	23 - 26	23 - 26	23 - 26	23 - 26	23 - 26
37	38	39	40	41	42
23 - 26	23 - 26	23 - 26	23 - 26	23 - 26	23 - 26
43	44	45	46	47	48
23 - 26	23 - 26	23 - 26	23 - 26	23 - 26	23 - 26

D. LISTED INFECTIOUS WASTES. Enter the four-digit number from 40 CFR Part 261.34 for each listed hazardous waste from hospitals, veterinary hospitals, medical and research laboratories your installation handles. Use additional sheets if necessary.

49	50	51	52	53	54
23 - 26	23 - 26	23 - 26	23 - 26	23 - 26	23 - 26

E. CHARACTERISTICS OF NON-LISTED HAZARDOUS WASTES. Mark "X" in the boxes corresponding to the characteristics of non-listed hazardous wastes your installation handles. (See 40 CFR Parts 261.21 - 261.24.)

☒ 1. IGNITABLE
(D001)

☐ 2. CORROSIVE
(D002)

☐ 3. REACTIVE
(D003)

☐ 4. TOXIC
(D000)

X. CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

SIGNATURE

NAME & OFFICIAL TITLE (type or print)

DATE SIGNED

**C.2 Compliance/
Enforcement**



Illinois Environmental Protection Agency

P. O. Box 19276, Springfield, IL 62794-9276

217/782-6761

July 8, 1992

St. Clair Pakwell
Attn: John Raevuori
120 South 25th Avenue
Bellwood, Illinois 60104

Mac Brothers
9 Century Drive
Oswego, Illinois 60543

RECEIVED
JUL 13 1992
OFFICE OF RCRA
Waste Management Division
U.S. EPA, REGION V

Re: 0310155004 -- Cook County
St. Clair Pakwell
ILT180010472
Compliance File

RECEIVED
WMD RECORD CENTER

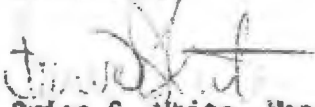
AUG 24 1994

Dear Mr. Raevuori:

The Agency is in receipt of your January 20, 1992 response(s) to our January 6, 1992 Compliance Inquiry Letter. Your response(s) has been reviewed and the apparent violation(s) of Section(s) 703.121(a), 703.150(a), 722.140(a), 722.140(b), 722.140(c), 725.113(a), 725.113(b), 725.115(b), 725.115(d), 725.173, 725.212(a), 725.242(a), 728.107(a)(1), 728.107(a)(5), and 728.109(a) are now considered resolved.

If you have any questions, please contact Todd Marvel at 217/785-8604.

Sincerely,


Brian S. White, Manager
Compliance Unit
Planning and Reporting Section
Division of Land Pollution Control

BSW:LS:dks/1852r, 31

cc: Barb Russell, USEPA



Illinois Environmental Protection Agency

P. O. Box 19276, Springfield, IL 62794-9276

B. U.S. EPA
B. Russell

217/732-6751

Refer to: D810155004 -- Cook County/
St. Clair Pakwell
ILT150010472
Compliance File

RECEIVED

JAN 09 1992

COMPLIANCE INQUIRY LETTER

Certified #P 681 209 752 & 753

January 6, 1992

OFFICE OF RCRA
Waste Management Division
U.S. EPA, REGION V

St. Clair Pakwell
Attn: John Raevuori
120 South 25th Avenue
Bellwood, Illinois 60104

The Brothers
9 Century Drive
Osage, Illinois 60542

Dear Mr. Raevuori:

The purpose of this letter is to address the status of the above-referenced facility in relation to the requirements of 35 Ill. Adm. Code, Subtitle G: Part 704, Subparts B and C, Part 722, Subparts A through G; Part 723, Subparts A through E; and Part 723, Subparts A through E and to inquire as to your position with respect to the apparent violations identified in Attachment A and your plans to correct these apparent violations. The Agency's findings of apparent non-compliance listed in Attachment A are based on an inspection completed on June 4, 1991 by Russ Crittenden of P&C Corporation (USEPA Contract #63-23-0006) with oversight by the Illinois Environmental Protection Agency. For your convenience a copy of the inspection report is enclosed with this letter.

Please submit in writing, within fifteen (15) calendar days of the date of this letter, the reasons for the identified violations, a description of the steps which have been taken to correct the violations and a schedule, including dates, by which each violation will be resolved. The written response, and two copies of all documents submitted in reply to this letter, should be sent to the following:

Lizz Schwartzkopf
Compliance Unit
Planning and Reporting Section
Illinois Environmental Protection Agency
Division of Land Pollution Control
2200 Churchill Road
Post Office Box 19276
Springfield, Illinois 62794-9276

Further, take notice that non-compliance with the requirements of the Illinois Environmental Protection Act and rules and regulations adopted thereunder may be the subject of enforcement action pursuant to either the Illinois Environmental Protection Act, Ill. Rev. Stat., Ch. 111 1/2, Sec. 1001 et seq. or the federal Resource Conservation and Recovery Act (RCRA), 42 U.S.C. Sec. 6901 et seq.



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If you have any questions regarding the above, please contact Cliff Davis at 708/531-5900.

Sincerely,

—
Brian S. White, Manager
Compliance Unit
Planning and Reporting Section
Division of Land Pollution Control

BSW:JED.LS:jab/3009/10-11

cc: Division File
Raymond FUS Region
Lizz Schwartzkopf
Gary Russell, USEPA
Rick Hersmann, P&C Environmental Management, Inc.
Hope Wright
Dana Curtiss



Attachment A

1. Pursuant to 35 Ill. Adm. Code 703.121(a), no person shall conduct any hazardous waste storage, hazardous waste treatment or hazardous waste disposal operation:

1. Without a RCRA permit for the LUL (hazardous waste management) facility; or
2. In violation of any condition imposed by a RCRA permit.

You are in apparent violation of 35 Ill. Adm. Code 703.121(a) for the following reason(s): Your facility does not have a permit for the storage of hazardous waste beyond 30 days after accumulation.

2. Pursuant to 35 Ill. Adm. Code 703.150(a), the owner or operator of an existing LUL facility or of an LUL facility in existence on the effective date of statutory or regulatory amendments that render the facility subject to the requirement to have a RCRA permit must submit Part A of the permit application to the Agency no later than the following times, whichever comes first:

1. Six months after the date of publication of regulations which first require the owner or operator to comply with standards in 35 Ill. Adm. Code 725; or
2. Thirty days after the date the owner or operator first becomes subject to the standards in 35 Ill. Adm. Code 725;
3. For generators which generate greater than 100 kilograms but less than 1000 kilograms of hazardous waste in a calendar month and treat, store or dispose of these wastes on-site, by March 21, 1987.

You are in apparent violation of 35 Ill. Adm. Code 703.150(a) for the following reason(s): Your facility has not filed a RCRA Part A permit application.

3. Pursuant to 35 Ill. Adm. Code 722.111, a person who generates a solid waste as defined in Section 721.101, must determine if that waste is a hazardous waste using the following method:

- a. He should first determine if the waste is excluded from regulation under Section 721.104.
- b. He must then determine if the waste is listed as a hazardous waste in Subpart D of Part 721.

Note: Even if a waste is listed, the generator still has an opportunity under Section 720.122 and 40 CFR Section 260.22 to demonstrate that the waste from his particular facility or operation is not a hazardous waste.



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c. If the waste is not listed as a hazardous waste in Support D of Part 721, we must determine whether the waste is identified in Support C of Part 721 by either:

1. Testing the waste according to the methods set forth in Support C of Part 721, or according to an equivalent method approved by the Board under Section 720.120; or
2. Applying knowledge of the hazard characteristic of the waste in light of the materials or the processes used.

You are in apparent violation of Section 722.111 for the following reason(s): Your 17 11c/ has not conducted a TCLP hazardous waste determination on its water-based ink waste stream.

4. Pursuant to 35 Ill. Adm. Code 722.134(a), except as provided in subsections (d), (e) or (f), a generator may accumulate hazardous waste on-site for 90 days or less without a permit or without having interim status provided that:

1. The waste is placed in containers and the generator complies with 35 Ill. Adm. Code 725, Subpart I or the waste is placed in tanks and the generator complies with 35 Ill. Adm. Code 725, Subpart J except 35 Ill. Adm. Code 725.297(c) and 725.300. In addition, such a generator is exempt from all the requirements in 35 Ill. Adm. Code 725, Subparts G and H, except for 35 Ill. Adm. Code 725.211 and 725.214;
2. The date upon which each period of accumulation begins is clearly marked and visible for inspection on each container;
3. While being accumulated on-site, each container and tank is labeled or marked clearly with the words, "Hazardous waste", and
4. The generator complies with the requirements for owners or operators in 35 Ill. Adm. Code 725 Subparts C (Preparedness and Prevention) and D (Contingency Plan and Emergency Procedures) and with 35 Ill. Adm. Code 725.116 (Personnel Training).

You are in apparent violation of 35 Ill. Adm. Code 722.134(a) in that item(s) 2 and 4 above was/were not complied with.

Specifically, the requirements of item 1 and/or 4 above (listed by regulation) which were not complied with, as well as the deficiencies observed, are:

- a. Pursuant to 35 Ill. Adm. Code 725.116(a), facility personnel must complete a program of classroom instruction or on-the-job training directed by a person trained in hazardous waste management procedures. The training must be designed to ensure that facility



personnel are able to respond to emergencies, and at a minimum meet the applicable requirements of Section 725.115(a)(3). You are in apparent violation of 35 Ill. Adm. Code 725.115(a) for the following reason(s): Your facility does not have a training program for personnel involved in the handling of hazardous waste.

- b. Pursuant to 35 Ill. Adm. Code 725.137, the owner or operator must attempt to make arrangements to familiarize local police, fire departments, emergency response teams and hospitals as well as state authorities with the hazardous aspects of the facility. These arrangements are to be included in the contingency plan. You are in apparent violation of 35 Ill. Adm. Code 725.137 for the following reason(s): Your facility has not made arrangements with the police, fire departments and hospitals, or with state and local emergency response teams.

- c. Pursuant to 35 Ill. Adm. Code 725.151(a), each owner or operator must have a contingency plan. The contingency plan must be designed to minimize hazards to man and/or the environment from fires, explosions or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil or surface water. You are in apparent violation of 35 Ill. Adm. Code 725.151(a) for the following reason(s): Your facility does not have a contingency plan.

5. 35 Ill. Adm. Code 722.140(a) requires the generator to keep a copy of each manifest signed in accordance with Section 722.123(a) for three years or until he receives a signed copy from the designated facility which received the waste. This signed copy must be retained as a record for at least three years from the date the waste was accepted by the initial transporter. You are in apparent violation of this Section in that your facility did not retain copies of each signed manifest for a period of three years.

6. 35 Ill. Adm. Code 722.140(b) requires the generator to keep a copy of each Annual Report and any Exception Report(s) for a period of at least three years from the due date. You are in apparent violation of this Section in that your facility did not retain copies of annual reports of a period of three years.

7. 35 Ill. Adm. Code 722.140(c) requires the generator to keep records of any test results, waste analyses or other determinations made in accordance with Section 722.111 for at least three years from the date that the waste was last sent to on-site or off-site treatment, storage or disposal facility. You are in apparent violation of this Section in that your facility did not retain copies of test results, waste analyses, or waste determinations for a period of three years.



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3. Pursuant to 35 Ill. Adm. Code 725.113(a):

1. Before an owner or operator treats, stores or disposes of any hazardous waste, the owner or operator shall obtain a detailed chemical and physical analysis of a representative sample of the waste. At a minimum, this analysis must contain all the information which must be known to treat, store or dispose of the waste in accordance with the requirements of this Part.
2. The analysis may include data developed under 35 Ill. Adm. Code 725 and existing published or documented data on the hazardous waste or on waste generated from similar processes.

(Board Note: For example, the facility's record of analyses performed on the waste before the effective date of these regulations or studies conducted on hazardous waste generated from processes similar to that which generated from processes similar to that which generated the waste to be managed at the facility may be included in the data base required to comply with subsection (a)(1). The owner or operator of an off-site facility may arrange for the generator of the hazardous waste to supply part or all of the information required by subsection (a)(1). If the generator does not supply the information and the owner or operator chooses to accept a hazardous waste, the owner or operator is responsible for obtaining the information required to comply with this Section.)
3. The analysis must be repeated as necessary to insure that it is accurate and up-to-date. At a minimum, the analysis must be repeated:
 - A. When the owner or operator is notified, or has reason to believe, that the process or operation generating the hazardous waste has changed, and
 - B. For off-site facilities, when the results of the inspection required in subsection (a)(4) indicate that the hazardous waste received at the facility does not match the waste designated on the accompanying manifest or shipping paper.
4. The owner or operator of an off-site facility shall inspect and, if necessary, analyze each hazardous waste movement received at the facility to determine whether it matches the identity of the waste specified on the accompanying manifest or shipping paper.

You are in apparent violation of 35 Ill. Adm. Code 725.113(a) for the following reason(s): Your facility did not conduct TCLP tests on its waste streams.



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9. Pursuant to 35 Ill. Adm. Code 725.113(a), the owner or operator shall develop and follow a written waste analysis plan which describes the procedures which the owner or operator will carry out to comply with subsection (a). The owner or operator shall keep this plan at the facility. At a minimum, the plan must specify:
1. The parameters for which each hazardous waste will be analyzed and the rationale for the selection of these parameters (i.e., the analysis for these parameters will provide sufficient information on the waste's properties to comply with subsection (a));
 2. The test methods which will be used to test for these parameters;
 3. The sampling method which will be used to obtain a representative sample of the waste to be analyzed. A representative sample may be obtained using either:
 - A. One of the sampling methods described in 35 Ill. Adm. Code 721. Appendix A or
 - B. An equivalent sampling method.(Board Note: See 35 Ill. Adm. Code 720.120(c) for related discussion.)
 4. The frequency with which the initial analysis of the waste will be reviewed or repeated to ensure that the analysis is accurate and up-to-date;
 5. For off-site facilities, the waste analyses that hazardous waste generators have agreed to supply;
 6. Where applicable, the methods which will be used to meet the additional waste analysis requirements for specific waste management methods as specified in Sections 725.293, 725.325, 725.352, 725.373, 725.414, 725.441, 725.475 and 725.502, and 35 Ill. Adm. Code 728.107; and
 7. For surface impoundments exempted from land disposal restrictions under 35 Ill. Adm. Code 728.104(a), the procedures and schedules for:
 - A). The sampling of impoundment contents;
 - B). The analysis of test data; and,
 - C). The annual removal of residues which are not delisted under 35 Ill. Adm. Code 720.122 and do not exhibit a characteristic of



Page 5

hazardous waste, and which do not meet the standards of 35 Ill. Adm. Code 728, Subpart D or, where no treatment standards have been established, the annual removal of residues which do not meet the applicable prohibition levels in 35 Ill. Adm. Code 728, Subpart C.

You are in apparent violation of 35 Ill. Adm. Code 725.113(b) for the following reason(s): Your facility does not have a written waste analysis plan.

10. Pursuant to 35 Ill. Adm. Code 725.115 (b):

1. The owner or operator shall develop and follow a written schedule for inspecting all monitoring equipment, safety and emergency equipment, security devices and operating and structural equipment (such as dikes and sump pumps) that are important to preventing, detecting or responding to environmental or human health hazards.
2. The owner or operator shall keep this schedule at the facility.
3. The schedule must identify the types of problems (e.g., malfunctions or deterioration) which are to be looked for during the inspection (e.g., inoperative sump pump, leaking fitting, eroding dike, etc.).
4. The frequency of inspection may vary for the items on the schedule. However, it should be based on the rate of possible deterioration of the equipment and the probability of an environmental or human health incident if the deterioration or malfunction or any operator error goes undetected between inspections. Areas subject to spills, such as loading and unloading areas, must be inspected daily when in use. At a minimum, the inspection schedule must include the items and frequencies called for in Sections 725.274, 725.293, 725.295, 725.326, 725.447, 725.477 and 725.503.

You are in apparent violation of 35 Ill. Adm. Code 725.115(b) for the following reason(s): Your facility does not have a written schedule for inspecting emergency equipment and hazardous waste accumulation and storage areas.

11. Pursuant to 35 Ill. Adm. Code 725.115(d), the owner or operator shall record inspections in an inspection log or summary. The owner or operator shall keep these records for at least three years from the date of inspection. At a minimum, these records must include the date and time of the inspection, the name of the inspector, a notation of the observations made and the date and nature of any repairs or other remedial actions.

You are in apparent violation of 35 Ill. Adm. Code 725.115(d) for the following reason(s): Your facility has not maintained an inspection log or summary.



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12. Pursuant to 35 Ill. Adm. Code 725.173.

- a. The owner or operator shall keep a written operating record at the facility.
- b. The following information must be recorded as it becomes available and maintained in the operating record until closure of the facility.
 1. A description and the quantity of each hazardous waste received and the date(s) and date(s) of its treatment, storage or disposal at the facility as required by Appendix A;
 2. The location of each hazardous waste within the facility and the quantity at each location. For disposal facilities the location and quantity of each hazardous waste must be recorded on a map or diagram of each cell or disposal area. For all facilities this information must include cross-references to specific manifest document numbers if the waste was accompanied by a manifest;

(Board Note: See Sections 725.213, 725.373 and 725.403 for related requirements.)
 3. Records and results of waste analysis and trial tests performed as specified in Sections 725.113, 725.300, 725.325, 725.351, 725.373, 725.414, 725.441, 725.475 and 725.602;
 4. Summary reports and details of all incidents that require implementing the contingency plan as specified in Section 725.150(j);
 5. Records and results of inspections as required by Sections 725.115(d) (except these data need be kept only three years),
 6. Monitoring, testing or analytical data where required by Sections 725.190, 725.194, 725.291, 725.293, 725.295, 725.375, 725.378, 725.390(4)(1), 725.447 and 725.477; and

(Board Note: As required by Section 725.194, monitoring data at disposal facilities must be kept throughout the post-closure period.)
 7. All closure cost estimates under Section 725.242 and, for disposal facilities, all post-closure cost estimates under Section 725.244.

You are in apparent violation of 35 Ill. Adm. Code 725.173 for the following reason(s): Your facility does not have a written operating record.



Page 6

13. Pursuant to 35 Ill. Adm. Code 725.212(a), the owner or operator of a hazardous waste management facility shall have a written closure plan. Until final closure is completed and certified in accordance with Section 725.215, a copy of the most current plan must be furnished to the Agency upon request, including request by mail. In addition, for facilities without approved plans, it must also be provided during site inspections on the day of inspection to any officer, employee or representative of the Agency.

You are in apparent violation of 35 Ill. Adm. Code 725.212(a) for the following reason(s): Your facility does not have a closure plan for the drum storage area.

14. Pursuant to 35 Ill. Adm. Code 725.242(a), the owner or operator shall have a detailed written estimate, in current dollars, of the cost of closing the facility in accordance with the requirements in Sections 725.217 through 725.219 and applicable closure requirements of Sections 725.247, 725.323, 725.333, 725.380, 725.410, 725.451, 725.481 and 725.504.

1. The estimate must equal the cost of final closure at the point in the facility's active life when the extent and manner of its operation would make closure the most expensive, as indicated by its closure plan (see Section 725.212(b)); and
2. The closure cost estimate must be based on the costs to the owner or operator of hiring a third party to close the facility. A third party is a party who is neither a parent nor a subsidiary of the owner or operator. (See definition of "parent corporation" in Section 725.241(d).) The owner or operator may use costs for on-site disposal if the owner or operator can demonstrate that on-site disposal capacity will exist at all times over the life of the facility.
3. The closure cost estimate must not incorporate any salvage value that may be realized by the sale of hazardous wastes, facility structures or equipment, land or other facility assets at the time of partial or final closure.
4. The owner or operator shall not incorporate a zero cost for hazardous waste which may have economic value.

You are in apparent violation of 35 Ill. Adm. Code 725.242(a) for the following reason(s): Your facility does not have an estimated cost of closure for the drum storage area.



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15. Pursuant to 35 Ill. Adm. Code 728.107(a), except as specified in Section 728.132 or 728.143, the generator shall test the generator's waste, or test an extract developed using the test method described in Appendix A, or use knowledge of the waste, to determine if the waste is restricted from land disposal under this Part.

You are in apparent violation of 35 Ill. Adm. Code 728.107(a) for the following reason(s): Your facility did not conduct a TCLP test on its waste streams.

16. Pursuant to 35 Ill. Adm. Code 728.107(a)(1), if a generator determines that the generator is managing a restricted waste under this Part and determines that the waste does not meet the applicable treatment standards set forth in Subpart D or exceeds the applicable prohibition levels set forth in Section 728.132 or 728.139, with each shipment of waste the generator shall notify the treatment or storage facility in writing of the appropriate treatment standard set forth in Subpart D and any applicable prohibition levels set forth in Section 728.132 or 728.139. The notice must include the following information:

- A) USEPA Hazardous Waste Number;
- B) The corresponding treatment standard and all applicable standards set forth in Section 728.132 or 728.139;
- C) The manifest number associated with the shipment of waste; and
- D) Waste analysis data, where available.

You are in apparent violation of 35 Ill. Adm. Code 728.107(a)(1) for the following reason(s): Your facility did not attach LOR notifications with each manifested waste shipment that exhibited a hazardous characteristic.

17. Pursuant to 35 Ill. Adm. Code 728.107(a)(5), generators shall retain on-site a copy of all notices, certifications, demonstrations, waste analysis data and other documentation produced pursuant to this Section for at least five years from the date that the waste that is the subject of such documentation was last sent to on-site or off-site treatment, storage or disposal. The five year record retention period is automatically extended during the course of any unresolved enforcement action regarding the regulated activity or as requested by the Agency.

You are in apparent violation of 35 Ill. Adm. Code 728.107(a)(5) for the following reason(s): Your facility did not retain copies of LOR notifications for a period of five years.



Page 10

18. Pursuant to 35 Ill. Adm. Code 728.109(a), the initial generator of a solid waste shall determine each waste code applicable to the waste in order to determine the applicable treatment standards under Subpart D. For purposes of Part 263, the waste will carry a waste code designation for any applicable listing under 35 Ill. Adm. Code 721, Subpart D, and also one or more waste code designations under 35 Ill. Adm. Code 721, Subpart C where the waste exhibits the relevant characteristic.

You are in apparent violation of 35 Ill. Adm. Code 728.109(a) for the following reason(s): Your facility did not assign both listed and characteristic waste codes where a listed waste exhibits a hazardous characteristic.

19. Pursuant to 35 Ill. Adm. Code 728.109(b), where a prohibited waste is both listed under 35 Ill. Adm. Code 721, Subpart D and exhibits a characteristic under 35 Ill. Adm. Code 721, Subpart C, the treatment standard for the waste code listed in 35 Ill. Adm. Code 721, Subpart D will operate in lieu of the standard for the waste code under 35 Ill. Adm. Code 721, Subpart C, provided that the treatment standard for the listed waste includes a treatment standard for the constituent that causes the waste to exhibit the characteristic. Otherwise, the waste must meet the treatment standards for all applicable listed and characteristic waste codes.

You are in apparent violation of 35 Ill. Adm. Code 728.109(b) for the following reason(s): Your facility did not assign treatment standards for listed wastes that cover constituents causing the waste to exhibit characteristics.

LS:jao/3359q/12-21



U.S. Environmental Protection Agency
Office of Waste Programs Enforcement
Contract No. 68-W9-0006



TES 9

**Technical Enforcement Support
at Hazardous Waste Sites
Zone III
Regions 5,6, and 7**

prc

PRC Environmental Management, Inc.

ILT 180 010 472

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COMPLIANCE EVALUATION INSPECTION

ST. CLAIR PAKWELL
BELLWOOD, ILLINOIS

FINAL REPORT

RELEASED
DATE 5/8/01
RIN #
INITIALS VJV

Prepared for:

U.S. ENVIRONMENTAL PROTECTION AGENCY
Office of Waste Programs Enforcement
Washington, DC 20460

Work Assignment No.	:	R05031
EPA Region	:	5
Site No.	:	ILT 180 010 472
Date Prepared	:	October 14, 1991
Contract No.	:	68-W9-0006
PRC No.	:	R05031-42
PRC Project Manager	:	Rick Hersemann
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Telephone No.	:	(312) 466-0222
Prepared By	:	Dynamac Corporation
EPA Work Assignment Manager	:	Barbara Russell
Telephone No.	:	312/353-7922

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A-2	Pre-inspection File Review Form
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1.0 INTRODUCTION

PRC Environmental Management, Inc. (PRC), received Work Assignment No. R05031 from the U.S. Environmental Protection Agency (EPA) under Contract No. 68-W9-0006 (TES 9). This assignment involves conducting Resource Conservation and Recovery Act (RCRA) compliance evaluation inspections (CEIs) in Illinois. As part of this assignment, PRC and Dynamac Corporation (Dynamac), PRC's TES 9 subcontractor, conducted a CEI at the St. Clair Pakwell facility in Bellwood, Illinois.

The objective of the CEI is to determine the facility's compliance with applicable portions of hazardous waste management regulations of the 35 Illinois Administrative Code (35 IAC) and corresponding Federal regulations (40 CFR Parts 261, 262, 265, and 268).

Dynamac met with the Illinois Environmental Protection Agency (IEPA) and conducted a pre-inspection file review on May 14, 1991. IEPA officials provided Dynamac, through PRC, with copies of checklists to be completed during the CEI. During the file audit, the Dynamac team member photocopied relevant material. Following the file audit, the Dynamac team leader completed the pre-inspection file review form and became acquainted with the facility's operation and regulatory history. Dynamac personnel also completed a review of EPA files relating to the facility.

On June 4, 1991, Dynamac conducted an unannounced CEI at St. Clair Pakwell. The following personnel were present:

John Raevuori	Field Container Corp., Environmental and Safety Coordinator
Tom Niehold	St. Clair Pakwell, Maintenance
Russ Crittenden	Dynamac, Inspection Team Leader
Darline Terrell	Dynamac, Inspector
Jeff Smith	Dynamac, Inspector

Dynamac interviewed on-site personnel, reviewed records, evaluated site waste management record keeping, and conducted an inspection of the facility's waste management operations. The inspectors completed the applicable checklists and took photographs of significant site operations and findings to assist in the compliance evaluation inspection.

This report describes the findings of the inspection and evaluates the facility's regulatory compliance. The completed checklists are provided in Appendix A and photographs taken during the inspection are included in Appendix B.

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2.0 FACILITY BACKGROUND

2.1 FACILITY LOCATION

St. Clair Pakwell is located at 120 S. 25th Avenue, Bellwood, Illinois, approximately 12 miles west of downtown Chicago, Illinois. The area surrounding the facility is largely commercial and industrial.

2.2 FACILITY OPERATIONS

The St. Clair Pakwell facility consists of one large building housing office space, various manufacturing operations, warehouse and shipping areas. Figure 1 shows the layout of St. Clair Pakwell facility. St. Clair Pakwell shares their office space with Handschy Corporation. The manufacturing areas are separate. Both companies are owned by Field Container Corporation of Elk Grove Village, Illinois. St. Clair Pakwell has been at its current location since 1956 and employs approximately 150 on three shifts.

St. Clair Pakwell manufactures gift wrap, boxes, and bags. Raw paper and chip board are purchased for the manufacturing of their products. The gift wrap, boxes, and bags are then put through a printing process for desired colors and designs. Water- and solvent-based inks are used in the printing process. The plates used in the printing process are made in the plate making room and are cleaned with perchloroethylene.

There are satellite accumulation areas (SAA) for waste inks located in the ink room and in the warehouse for the press wash.

2.3 REGULATORY STATUS AND HISTORY

St. Clair Pakwell currently operates as a RCRA hazardous waste generator and storage facility. According to the Uniform Hazardous Waste Manifests and Annual Reports from 1989 and 1990, reviewed during the June 1991 inspection, St. Clair Pakwell ships approximately 21 drums (1,155 gallons) of hazardous wastes off-site per month. St. Clair Pakwell was unable to locate their 1988 Hazardous Waste Manifests and Annual Reports.

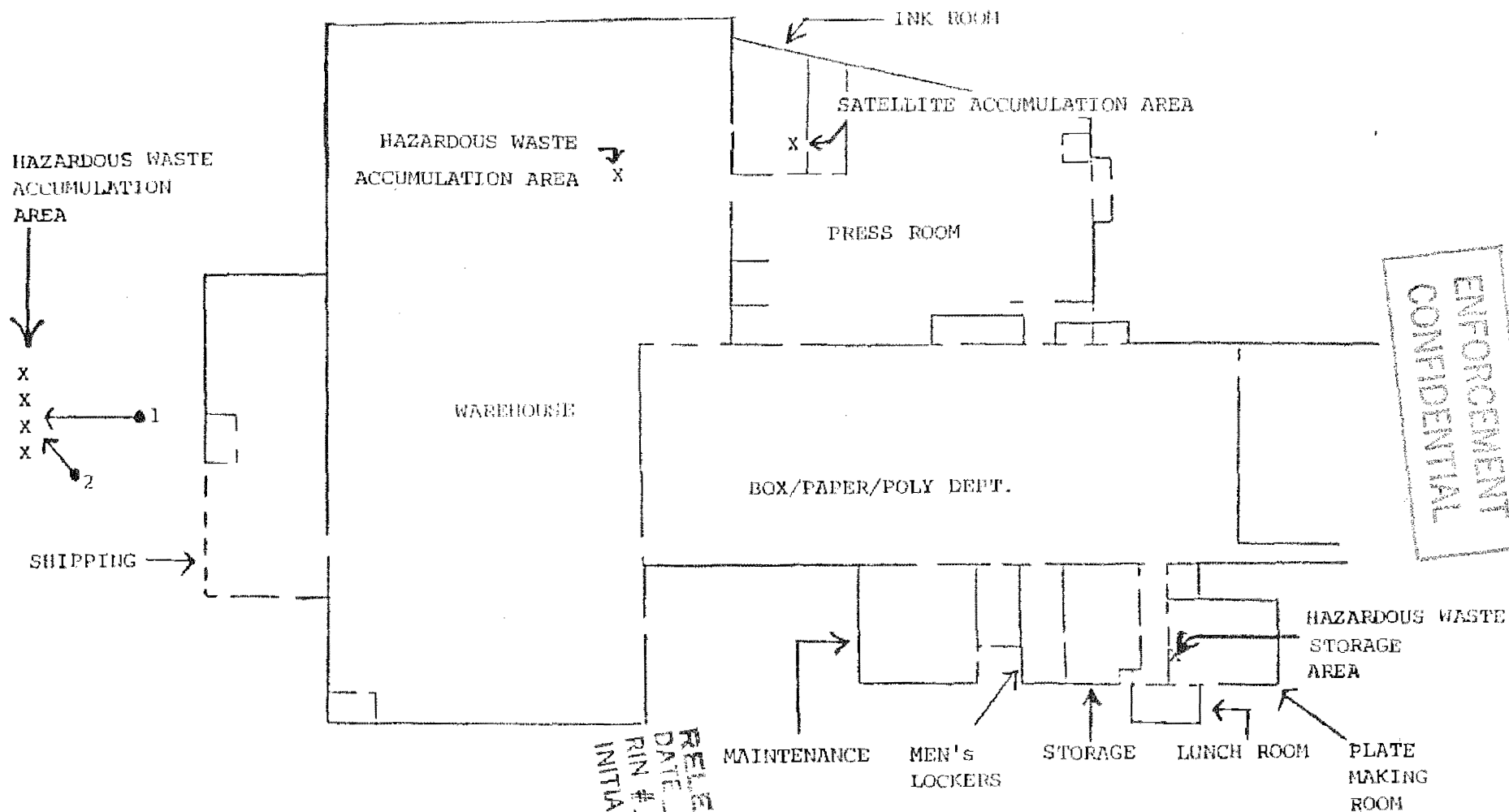
St. Clair Pakwell submitted a Notification of Hazardous Waste Activity (EPA Form 8700-12) for generator status on August 25, 1980 (St. Clair Pakwell, 1980). No record of a previous inspection of the St. Clair Pakwell facility was present in IEPA files. No previous violations are known.

3.0 WASTE STREAMS

Three hazardous waste streams are routinely generated from St. Clair Pakwell's processes. The waste streams include waste sludge, waste inks, and press wash. Waste perchloroethylene is generated from the cleaning of plates for the printing presses (F002). The waste from cleaning the plates is a sludge, containing a solvent mixture of 75% perchloroethylene and 25% butyl alcohol (F003). The sludge is put into nylon bags and deposited into a 30-gallon fiber treated drum located in the plate making room. This is St. Clair Pakwell's hazardous waste accumulation area for their plate wash waste.

The inks used at the facility contain both water and alcohol as a base. After use the inks are recycled on-site. The inks do not become a waste until the Waste Room Manager decides they can no longer be used. The waste ink (F003/D001) contains various proportions of methanol, n-butyl alcohol, and isobutanol, and flashed below 140 degrees Fahrenheit in a flash test. The waste ink (F003/D001) is accumulated in a 55-gallon satellite accumulation drum located in the ink room. When the drum is full it is labelled and moved outside to a hazardous waste accumulation area.

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FIGURE 1
FACILITY LAYOUT - ST. CLAIR PAKWELL

(Facility Boundaries Not Shown on Map)

(Not to Scale)

(Numbers and arrows indicate photographs taken and direction)

The press wash consists of soap and water and is used for cleaning the presses. The waste press wash contains waste inks. The facility designates this waste F003/D001, because it is generated from the mixing of a listed waste with water. However, it is not likely that the waste is actually ignitable. This waste is put in a 55-gallon drum located in the warehouse. Tom Niehold stated that this drum is not always in the same place within the press room, but is always near the press that is being washed. When the drum is full it is labelled and moved to the outside hazardous waste storage area. The press wash and the waste inks contain many of the same constituents and are often combined into the same 55-gallon drums before removal to the container storage area.

St. Clair Pakwell generates three nonhazardous waste streams. These nonhazardous waste streams are paper, waste oils, and hydraulic fluids.

4.0 INSPECTION FINDINGS

4.1 RECORDS REVIEW

Dynamac reviewed the records of hazardous waste activity at the St. Clair Pakwell facility. The records reviewed included the manifests, annual reports, hazardous waste notification forms, and other records related to hazardous waste generation. The following deficiencies with St. Clair Pakwell personnel files and record keeping were identified.

- St. Clair Pakwell did not file a Part A permit application.
- St. Clair Pakwell's records did not go back 3 years. Specifically, the 1988 annual report which was filed by March 31, 1989, was not available. Manifests for waste shipments between June and December, 1988 were also not available.
- St. Clair Pakwell did not have documentation of results of inspections of the satellite accumulation and container storage areas in a log or summary.
- St. Clair Pakwell did not have Land Disposal Restriction notifications available for each shipment of hazardous waste.
- St. Clair Pakwell did not retain copies of Land Disposal Restriction notifications for a period of five years.
- St. Clair Pakwell did not have documentation of a personnel training program, annual refreshers, or initial training of new employees within 6 months of start of employment.
- St. Clair Pakwell's personnel records did not include titles and specific job descriptions for individuals involved in hazardous waste management.
- St. Clair Pakwell did not have a formal contingency plan for their hazardous waste.
- St. Clair Pakwell did not have a written operating record.
- St. Clair Pakwell did not make arrangements with local authorities for responding to emergencies that may occur at the facility.
- St. Clair Pakwell did not have a written schedule for inspecting all equipment important to preventing, detecting, or responding to environmental or human health hazards.
- St. Clair Pakwell did not have a written waste analysis plan.

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-St. Clair Pakwell did not have documentation of TCLP analysis or other waste analysis done on their hazardous waste or waste streams.

-St. Clair Pakwell did not have a closure plan for the drum storage area.

4.2 FACILITY INSPECTION

The facility inspection covered plant production units, hazardous waste SAAs, and the hazardous waste container storage areas.

Dynamac inspected the ink room where St. Clair Pakwell has a satellite accumulation 55-gallon drum (Photo not available, film did not develop). Inks are recycled until the Waste Room Manager determines they are too dirty for use. Waste inks are accumulated in a satellite accumulation 55-gallon drum located in the ink room. The drum was labelled.

St. Clair Pakwell has two container accumulation areas (CAAs). The first is in the warehouse near the press room. Press wash waste is accumulated in 5-gallon buckets when the presses are cleaned. The press wash waste is taken to a 55-gallon drum located in the warehouse (Photo not available, film did not develop). The drum was labelled, but not dated. When the drums of waste press wash are full, they are taken to the second CAA, located outside about 50 yards west of the building (see Appendix B, Photo 1). Four 55-gallon drums containing waste ink (D001/F003), and waste press wash (designated D001/F003) were observed in the storage area. Dynamac observed the following dates on the drums: 5/14/91, 5/25/91, 5/28/91, and 5/29/91. These containers had been accumulated on-site less than 90 days at the time of the 6/4/91 inspection. The containers were labelled (see Appendix A, Photo 2).

St. Clair Pakwell also has a hazardous waste storage area located in the plate making room. Four fiber treated 30-gallon drums containing waste sludge (F002) with a solvent phase comprised of 75% perchloroethylene and 25% n-butyl alcohol were located along the west wall. The facility did not list this as an F003 waste for the n-butyl alcohol content or characterize it as a D001 waste for its ignitability. Dynamac observed the following accumulation dates on the containers: 2/28/91, 3/22/91, 4/17/91, and 5/4/91. The drum labeled 2/28/91 was on-site nine days over the 90-day limit at the time of the 6/4/91 inspection. John Raevuori stated that Chemical Waste Management Chemical Services Incinerator was closed down and St. Clair Pakwell was unable to ship the drums. However, the facility did not request a 30-day extension under IAC 722.134(b). The containers were labelled.

5.0 INSPECTION SUMMARY AND REGULATORY DETERMINATIONS

Dynamac inspected St. Clair Pakwell as a generator of hazardous waste and storage facility. During the CEI, Dynamac identified problems with the facility's job descriptions, record keeping, and hazardous waste management. The specific 35 IAC Violations are listed below.

- 1) 703.121 (a). The facility did not have a RCRA permit for storage of hazardous waste greater than 90 days.
- 2) 703.150 (a). The facility had not filed a RCRA Part A permit application.
- 3) 722.111. The facility did not perform TCLP analysis on its hazardous waste.
- 4) 722.134 (a). The facility accumulated waste press wash in a drum inside the warehouse without marking the accumulation start date on the container.

- 5) 722.140 (a). The facility did not retain a copy of each signed manifest for a period of three years.
- 6) 722.140 (b). The facility did not retain a copy of each annual report for a period of three years.
- 7) 722.140 (c). The facility did not retain copies of test results, waste analyses, or other waste determinations made in accordance with Section 722.111.
- 8) 725.113 (a). The facility had not obtained a detailed chemical analysis of each waste prior to its treatment, storage or disposal.
- 9) 725.113 (b). The facility did not have a written waste analysis plan.
- 10) 725.115 (b). The facility did not have a written schedule for inspecting all equipment important to preventing, detecting or responding to environmental or human health hazards.
- 11) 725.115 (d). The facility did not have a written record of the results of inspections in a log or summary.
- 12) * 725.116 (a). The facility did not have a personnel training program.
- 13) * 725.137. The facility did not have arrangements with local authorities that are appropriate for the type of wastes handled at the facility.
- 14) * 725.151 (a). The facility did not have a contingency plan to minimize hazards to human health or the environment from fires, explosions or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil, or surface water.
- 15) * 725.173 (b). The facility did not have a written operating record.
- 16) 725.212. The facility did not have a closure plan for the drum storage areas.
- 17) 725.242 (a). The facility did not have an estimate of closure costs for the drum storage areas.
- 18) 728.107 (a). The facility did not perform TCLP tests on its waste streams.
- 19) 728.107 (a)(1). The facility did not attach Land Disposal Restriction Notifications to all manifested waste shipments.
- 20) 728.107 (a)(6). The facility did not retain copies of Land Disposal Restriction Notifications for a period of 5 years.
- 21) 728.109 (a). The facility did not assign both listed and characteristic waste codes where a listed waste exhibits a hazardous characteristic.
- 22) 728.109 (b). The facility did not assign treatment standards for listed wastes that cover constituents causing the waste to exhibit characteristics.

* These are also violations of the General Requirements of 722.134(a).

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REFERENCES

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St. Clair Pakwell, 1980, Notification of Hazardous Waste Activity. Submitted by William Kaehler, St. Clair Pakwell, Plant Manager (August 18).

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RIN # _____
INITIALS WV

APPENDIX A
INSPECTION CHECKLISTS

A-1 RCRA INSPECTION REPORT

A-2 PRE-INSPECTION FILE REVIEW FORM

A-3 GENERATOR AND TSD CHECKLISTS

A-4 RCRA LAND DISPOSAL RESTRICTION INSPECTION CHECKLIST

A-1 RCRA INSPECTION REPORT

Illinois Environmental Protection Agency
Division of Land Pollution Control

RCRA INSPECTION REPORT

USEPA #: IL <u>TL 50010472</u>	EPA #: <u>0310158-04</u>
Facility Name: <u>St. Clair Parkwell</u>	Phone #: <u>(312) 276-6425</u>
Street Address: <u>120 25th Ave</u>	County: <u>Cook</u>
City: <u>Bellwood</u>	State: <u>Ill.</u> Zip: <u>60413</u>
Region: <u>Midwest</u>	Inspection Date: <u>8/19/91</u> From: <u>9:30</u> To: <u>12:00</u>
Weather: <u>Sunny 75°</u>	

TYPE OF FACILITY

Notified As: <u>Generator</u>	Regulated As: <u>C5</u>
LDF? <u>Yes</u> HPV? <u>No</u>	90-Day F/U Required?: YES <u>X</u> NO <u> </u>

TYPE OF INSPECTION

CEI: <u>X</u>	Sampling: <u> </u>	Citizen Complaint: <u> </u>	Closed: <u> </u>	Other: <u> </u>
CME/O&M: <u> </u>	Record Review: <u> </u>	Follow-Up to Inspection of: <u> </u>	Withdrawal: <u> </u>	

NON-REGULATED STATUS

SQG: <u> </u>	Claimed Nonhandler: <u> </u>	Other (Specify in Narrative): <u> </u>
----------------	-------------------------------	---

PART A

Notification Date: <u>8/25/90</u> , from (initial) or (subsequent) Notification.
Initial Part A Date: <u> </u> / <u> </u> / <u> </u> NA
Amended: <u> </u> / <u> </u> / <u> </u>
Part A Withdrawal requested: <u> </u> / <u> </u> / <u> </u>
Approved by (US)(IL) EPA: <u> </u> / <u> </u> / <u> </u>

PART B PERMIT APPLICATION

Part B Permit Submitted: Y or <u>(N)</u> <u> </u> / <u> </u> / <u> </u>	Final Permit Issued: <u> </u> / <u> </u> / <u> </u>
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Has the firm been referred to --	USEPA: Y or <u>(N)</u> <u> </u> / <u> </u> / <u> </u>
Illinois Attorney General: Y or <u>(N)</u> <u> </u> / <u> </u> / <u> </u>	County State's Attorney: Y or <u>(N)</u> <u> </u> / <u> </u> / <u> </u>

ORDERS ISSUED

CACO: <u> </u> / <u> </u> / <u> </u>	CAFO: <u> </u> / <u> </u> / <u> </u>	Consent Decree: <u> </u> / <u> </u> / <u> </u>
Federal Court Order: <u> </u> / <u> </u> / <u> </u>	State Court Order: <u> </u> / <u> </u> / <u> </u>	IPCB Order: <u> </u> / <u> </u> / <u> </u>

TSD FACILITY ACTIVITY SUMMARY

Activity by Process Code	On Part A?	Activity Conducted Prior to 1987	Was Activity Ever Done?	Closed	Being done at Time of Insp.?	Exempt per 35 IAC, Sec.	On Annual Report		
							1988	1989	1990
<u>SC 1</u>	<u>No Part A</u>	<u>unknown</u>	<u>Yes</u>	<u>No</u>	<u>Yes</u>	<u>No</u>	<u>No</u>	<u>No</u>	<u>No</u>

OWNER**OPERATOR**

Name	FIELD CONTAINER CORPORATION	Name	ST. CLAIR PARKWELL
Address	1500 NICHOLAS BOULEVARD	Address	120 SOUTH 25 TH AVENUE
City	ELK GROVE VILLAGE	City	BELLWOOD
State	IL	State	IL
Zip	60007	Zip	60104
Phone #	(708) 437-1700	Phone #	(312) 276-6400

PERSON(S) INTERVIEWED**TITLE****PHONE #**

* JOHN RAEVUORI	ENVIRONMENTAL & SAFETY COORDINATOR	(708) 437-1700
TOMMY NIEHOLD	MAINTENANCE	(312) 276-6400

INSPECTION PARTICIPANT(S)**AGENCY/TITLE****PHONE #**

DARLINE F. TERRELL	USEPA / CONTRACTOR	(301) 417-9800
RUSS CRITTENDEN	USEPA / CONTRACTOR	(312) 466-0222
JEFFREY SMITH	USEPA / CONTRACTOR	(312) 466-0222

PREPARED BY**AGENCY/TITLE****PHONE #**

RUSS CRITTENDEN	USEPA / CONTRACTOR	(312) 466-0222
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SUMMARY OF APPARENT VIOLATIONS

Area	Class	Section
OTH	1	703.121 (a)
OTH	1	703.150 (a)
OTH	1	722.111
OTH	1	722.134 (a)
OTH	2	722.140 (a)
OTH	2	722.140 (b)
OTH	2	722.140 (c)
OTH	1	725.113 (a)
OTH	1	725.113 (b)
OTH	2	725.115 (b)
OTH	2	725.115 (d)
OTH	1	725.116 (a)
OTH	2	725.137

Area	Class	Section
OTH	1	725.151 (a)
OTH	2	725.173 (b)
CLO	1	725.212
FIN	1	725.242 (a)
LDR	1	728.107 (a)
LDR	1	728.107 (a)(1)
LDR	1	728.107 (a)(6)
LDR	1	728.109 (a)
LDR	1	728.109 (b)

Area	Class	Section

Facility Name: St. Clair Parkwell
 USEPA #: IL T180010472
 IEPA #: 0310155004

WASTE DISPOSITION FORM

Waste Name (include haz & waste for which no determination has been made)	Generating Process (For waste gen. on site. N/A for TSD)	Date of Last Analysis	USEPA Haz Waste #			On Annual Report for: (Circle if present; cross out if not present)			Amount on Site	Rate of Generation	Last Manifested Shipment	Disposition
			* On 8700-12	* On 3510-3	* 19 90	* 19 87	* 19 84					
Waste Ink and Plate Wash	developing, etching, and cleaning of the plates	None	F005	not listed	N/A	<input checked="" type="checkbox"/> G	<input checked="" type="checkbox"/> G	<input checked="" type="checkbox"/> G	See manifest	20 drums/yr	1-20-91	Industrial Fluids EPA 600/4-91-010
Waste Plate Wash	cleaning of plates	None	F002	not listed	N/A	<input checked="" type="checkbox"/> G	<input checked="" type="checkbox"/> G	<input checked="" type="checkbox"/> G	See manifest	1 drum/yr	12-14-90	Industrial Waste Management Chemical Services, Chicago, IL
Paper (non-hazardous)	waste paper and cardboard	None	N/A	not listed	N/A	<input checked="" type="checkbox"/> G	<input checked="" type="checkbox"/> G	<input checked="" type="checkbox"/> G	See manifest	1000 lbs/yr	N/A	Waste Paper and Cardboard
Waste Cils (non-hazardous)	used cils from facility equipment (presses, forklifts, etc.)	None	N/A	not listed	N/A	<input checked="" type="checkbox"/> G	<input checked="" type="checkbox"/> G	<input checked="" type="checkbox"/> G	See manifest	1000 lbs/yr	N/A	Safety Kleen Chicago, IL
Waste Hydraulic Fluids (non-hazardous)	used hydraulic fluids from facility's equipment (presses, forklifts, etc.)	None	N/A	not listed	N/A	<input checked="" type="checkbox"/> G	<input checked="" type="checkbox"/> G	<input checked="" type="checkbox"/> G	See manifest	1000 lbs/yr	N/A	Safety Kleen Chicago, IL
						<input checked="" type="checkbox"/> G	<input checked="" type="checkbox"/> G	<input checked="" type="checkbox"/> G				
						<input checked="" type="checkbox"/> G	<input checked="" type="checkbox"/> G	<input checked="" type="checkbox"/> G				
						<input checked="" type="checkbox"/> G	<input checked="" type="checkbox"/> G	<input checked="" type="checkbox"/> G				
						<input checked="" type="checkbox"/> G	<input checked="" type="checkbox"/> G	<input checked="" type="checkbox"/> G				
						<input checked="" type="checkbox"/> G	<input checked="" type="checkbox"/> G	<input checked="" type="checkbox"/> G				

* All "NO" responses must be explained in narrative.

A-2 PRE-INSPECTION FILES AUDIT CHECKLIST

PRE-INSPECTION FILE REVIEW FORM

Facility Name: St Clair Mfg Corp
Location: 120 25th Ave. Bellwood IL 60104
ID#: ILT 180 010 472
Activity: Generator
Last Inspection
if applicable: NA
Past Violations: NA

A-3 GENERATOR AND TSD CHECKLISTS

Area	Class	90 Day F U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No		
OTH	1			PART 722 GENERATOR STANDARDS Subpart A: General Section 722.111: Hazardous Waste Determination Has the generator determined if the solid waste it generates is a hazardous waste? Yes _____ No <input checked="" type="checkbox"/> Did the generator follow the procedures specified in this section in making its determination? Yes _____ No <input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>		
OTH	1			Section 722.112: USEPA Identification Number a Has the generator obtained a USEPA identification number? Yes <input checked="" type="checkbox"/> No _____ c Has the generator offered his hazardous waste only to transporters or to treatment, storage or disposal facilities that have received a USEPA identification number? Yes <input checked="" type="checkbox"/> No _____	<input checked="" type="checkbox"/>			

Area	Class	90 Day F U Req	Key	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No		
MAN	2			PART 722 GENERATOR STANDARDS Subpart B: The Manifest Section 722.120: General Requirements	✓			
			a	Has the generator who transports, or who offers its hazardous waste for transportation off-site for treatment, storage or disposal prepared a uniform hazardous waste manifest? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>				
				Note: If the generator has not used a manifest, check "No" in the Apparent Compliance Column and skip to 722.130.				
			b	Did the generator designate on the manifest one facility which is permitted to handle the hazardous waste therein described? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>				
				Note: The generator may also designate an alternate facility permitted to handle the hazardous waste in the event an emergency prevents delivery of the hazardous waste to the primary designated facility.				
			d	In any instances where the transporter was unable to deliver the hazardous waste to the designated or alternate permitted facility, has the generator designated another permitted facility or instructed the transporter to return the waste? Yes <input type="checkbox"/> No <input type="checkbox"/> w/ <input checked="" type="checkbox"/>				

GEN-B-1

Area	Class	90 Day F U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No		
MAN	2			Section 722.121: Acquisition of Manifests a Did the generator use the manifest supplied by the Agency for hazardous waste going for treatment, storage or disposal in Illinois? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> b For hazardous waste going outside Illinois for treatment, storage or disposal, has the generator used the manifest supplied by the Agency if the State to which the hazardous waste is being shipped does not supply and require the completion of its own State manifest? or For hazardous waste going outside Illinois for treatment, storage or disposal, has the generator used the manifest required by the State to which the hazardous waste is being shipped? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	<input checked="" type="checkbox"/>			
MAN	2			Section 722.122: Number of Copies Does the manifest the generator is using consist of at least six copies (plus one copy for each additional transporter)?	<input checked="" type="checkbox"/>			
MAN	2			Section 722.123: Use of the Manifest For each manifest received, has the generator: <ol style="list-style-type: none"> Signed the certificate by hand? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Obtained the handwritten signature and the date of acceptance by the initial transporter? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> 	<input checked="" type="checkbox"/>			

GEN-B-2

Area	Class	90 Day F/U Req	Key Ltr		Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub	Sec		Yes	No		
					<p>3) Retained one copy as required by Section 722.140(a), Recordkeeping? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>4) Apparently sent a copy (Part 5 for Illinois manifests) to the Agency within two working days? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>NOTE: Obtain a copy of any manifest which is not in compliance with the requirements of this subsection. If copies are unobtainable, log manifest #s.</p> <p>b Has the generator apparently given the remaining copies of the manifest to the transporter? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>c Has the generator followed the procedures prescribed in Section 722.123(c) for manifesting bulk shipments of hazardous waste by water? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/></p> <p>d Has the generator followed the procedures prescribed in Section 722.123(d) for manifesting bulk shipments of hazardous waste by rail? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/></p>				<p>Do not ship by water</p> <p>Do not ship by rail</p>

GEN-B-3

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comments
			Sub Sec		Yes	No		
OTH	1	X		PART 722 GENERATOR STANDARDS Subpart C: Pre-Transport Requirements Section 722.130: Packaging Is waste which is ready for transportation off-site packaged in accordance with 49 CFR, Parts 173, 178 and 179?				✓ No Waste ready for Shipment.
OTH	1	X		Section 722.131: Labeling Is each package of hazardous waste which is ready for transportation off-site labeled in accordance with 49 CFR Part 172?				✓ No Waste ready for Shipment.
OTH	1	X		Section 722.132: Marking a Is each package of hazardous waste which is ready for transportation off-site marked in accordance with 49 CFR Part 172? Yes ____ No ____				✓ No Waste ready for Shipment.
			b	Is each package of hazardous waste which is ready for transportation off-site marked with: <ul style="list-style-type: none"> - The generator's name and address? Yes ____ No ____ - The manifest document number associated with the container? Yes ____ No ____ - The words "Hazardous Waste - Federal Law Prohibits Improper Disposal. If found contact the nearest police, or public safety authority or the U.S. Environmental Protection Agency"? Yes ____ No ____ 				

GEN-C-1

Area	Class	90 Day F/U Req	Key Ltr		Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec	Yes		No			
OTH	1				Section 722.133: Placarding Does the generator have, for the waste it generates, the proper placards to: - Placard the transport vehicle, or - Offer to the first transporter, according to 49 CFR, Part 172, Subpart F? <u>NOTE:</u> If the placards are provided by the transporter, then mark the N/A Column and use Comment field to explain.			✓	Placards are provided by the transporter
OTH	1	X			Section 722.134: Accumulation Time <u>NOTE:</u> If the TSD checklist will be completed and the facility only accumulates wastes for 90 days or less for Section 722.134 complete page GEN-C-2(a) then skip to TSD checklist. <u>NOTE:</u> A generator who is also a TSD would be subject to this section for any waste which is not identified for storage on the facility's Part A, or which is being accumulated outside a "permitted" storage area. a For waste in containers, has the generator complied with the requirements of 35 Ill. Adm. Code 725, Subpart I: Use and Management of Containers listed below: <u>NOTE:</u> If no wastes in containers, mark "N/A" and skip to Section 725.291 of the Generator checklist.			✓	During the CEI one drum was observed on-site for 99 days.

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No		
OTH	I	X		Section 722.134: Accumulation Time		<input checked="" type="checkbox"/>		<p>Single waste press wash drum in warehouse not dated.</p> <p>See TSD checklist for specifics:</p> <p>Pages C-3 thru C-25 deleted.</p>
				<p><u>NOTE:</u> A generator who is also a TSD would be subject to this section for any waste which is not identified for storage on the facility's Part A, or which is being accumulated outside a "permitted" storage area.</p>				
			a1	<p>For waste in containers, has the generator complied with the requirements of 35 Ill. Adm. Code 725, Subpart I?</p> <p style="text-align: center;">and/or</p> <p>For waste in tanks, has the generator complied with the requirements of 35 Ill. Adm. Code 725, Subpart J except Section 725.297(c) and 725.300?</p> <p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p>				
			a2	<p>For waste in containers, has the generator marked and made visible for inspection on each container, the date upon which accumulation began?</p> <p>Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/></p>				
			a3	<p>For waste in containers and tanks, has the generator marked or labeled each with the words "Hazardous Waste"?</p> <p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p>				
a4	<p>Has the generator complied with the requirements of 35 Ill. Adm. Code 725, Subparts C and D, and Section 725.116?</p> <p>Yes <input type="checkbox"/> No <input checked="" type="checkbox"/></p>							

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
			Sub Sec		Yes	No		
				<p align="center">SATELLITE ACCUMULATION</p> <p>c1 Is the generator who accumulates hazardous waste in containers at or near any point of generation where wastes initially accumulate and which is under the control of the operator of the process generating the waste:</p> <ul style="list-style-type: none"> - Limiting such accumulation to 55 gallons (one quart of acutely hazardous waste listed in 35 Ill. Adm. Code 721.133)? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> - Complying with the requirements of: <ol style="list-style-type: none"> 1) 35 Ill. Adm. Code 725.271, Condition of Containers? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> 2) 35 Ill. Adm. Code 725.272, Compatibility of Waste with Containers? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> 3) 35 Ill. Adm. Code 725.273(a), Management of Containers - requiring that the containers be stored closed except when waste is being added or removed? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> - Marking the containers with the words "Hazardous Waste" or with words that identify the contents of the containers? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> 				

GEN-C-26

Area	Class	90 Day F/U Req	Key		Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Ltr	Sub Sec		Yes	No		
				c2	<p>Has the generator who accumulates more than 55 gallons (one quart of acutely hazardous waste listed in 35 Ill. Adm. Code 721.133(e)) with respect to the amount of excess waste, complied with the requirements in Section 722.134(a) within three days? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>Are the containers with the excess amounts marked with the date accumulation began? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>During the three day period, is the generator continuing to comply with the requirements of Section 722.134(c)(1)? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p>				

GEN-C-27

Area	Class	SO Day F/U Req	Key Ltr		Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec	Yes		No			
OTH	2				PART 722				
					GENERATOR STANDARDS				
					Subpart D: Recordkeeping and Reporting				
					Section 722.140: Recordkeeping				
					Has the generator retained for a period of three years:				
					a - A copy of each signed manifest? Yes _____ No <input checked="" type="checkbox"/>				
b - A copy of each annual report? Yes _____ No <input checked="" type="checkbox"/>									
b - A copy of each exception report? Yes _____ No _____ N/A <input checked="" type="checkbox"/>									
c - Copies of test results, waste analyses or other determinations made in accordance with Section 722.111? Yes _____ No <input checked="" type="checkbox"/> N/A _____									
d Does a generator who is involved in any unresolved en- forcement action continue to maintain the records required in 722.140(a) thru (c)? Yes _____ No _____ N/A <input checked="" type="checkbox"/>									
d If the Director has requested that the records required in 722.140(a) thru (c) be maintained for a period longer than three years, has the generator continued to maintain them? Yes _____ No _____ N/A <input checked="" type="checkbox"/>									

No exception reports

No unresolved enforcement actions

St. Clair Pakwell does not have to keep their records for more than 3 years

GEN-D-1

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No		
OTH	2			<p>Section 722.141: Annual Reporting</p> <p>Has the generator who ships waste off-site to a treatment, storage or disposal facility within the United States prepared and submitted a copy of an annual report, as supplied by the Agency, to the Agency by March 1 for the preceeding calendar year?</p> <p>NOTE: A generator who treats, stores or disposes of hazardous waste on-site must also submit an annual report as a TSD in accordance with the requirements of 35 Ill. Adm. Code 702, 703, 724, 725 and 40 CFR 266.</p>	<input checked="" type="checkbox"/>			
MAN	1			<p>Section 722.142: Exception Reporting</p> <p>a Has the generator who has not received a signed copy of the manifest from the designated TSD within 35 days of the date the waste was accepted by the initial transporter determined the status of its hazardous waste? Yes ____ No ____</p> <p>b Has the generator who has not received a signed copy of the manifest from the designated TSD within 45 days of the date the waste was accepted by the original transporter submitted an exception report to the Director? Yes ____ No ____</p> <p>b Does any exception report submitted to the Director contain the following:</p> <ul style="list-style-type: none"> - A legible copy of the manifest for which the generator does not have confirmation of delivery; and 				<input checked="" type="checkbox"/> No exception reporting has been needed

GEN-D-2

Area	Class	90 Day F.U. Req	Key Lit	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
					Yes	No		
OTH	1			PART 703				
				RCRA PERMIT PROGRAM				
				Subpart B: Prohibitions				
				Section 703.121: RCRA Permits				
				a Is any person(s) conducting any hazardous waste storage, hazardous waste treatment or hazardous waste disposal operation doing so only:				
				1) With a RCRA permit for the HWM facility? Yes _____ No <input checked="" type="checkbox"/>				
				2) In conformance with all conditions imposed by the RCRA permit? Yes _____ No <input checked="" type="checkbox"/> N/A _____				
				b Do the owner and operator of hazardous waste management units have permits during the active life of the unit (including the closure period)? Yes _____ No <input checked="" type="checkbox"/>				
				b Do the owners and operators of any hazardous waste unit which closed after January 26, 1982 have a permit during any post-closure period required under 35 Ill. Adm. Code 724.217 Post Closure Care and Use of Property and during any compliance period or any extension of that compliance period specified under 35 Ill. Adm. Code 724.196, Compliance Period? Yes _____ No _____ N/A <input checked="" type="checkbox"/>				

PER-B-1

Area	Class	90 Day F/U Req	Key In Sub Sec	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
					Yes	No		
OTH	1			PART 703 RCRA PERMIT PROGRAM Subpart C: Authorization by Rule and Interim Status Section 703.150: Application by Existing HWM Facilities and Interim Status Qualifications				
				a Has the owner or operator of an existing HWM facility or of a HWM facility in existence on the effective date of statutory or regulatory amendments that render the facility subject to the requirement to have a RCRA permit submitted Part A of the permit application to the Agency no later than the following times, whichever comes first: 1) Six months after the date of publication of regulations which first require the owner or operator to comply with standards in 35 Ill. Adm. Code 725? Yes _____ No <input checked="" type="checkbox"/> N/A _____ 2) Thirty days after the date the owner or operator first becomes subject to the standards in 35 Ill. Adm. Code 725? Yes _____ No <input checked="" type="checkbox"/> N/A _____ 3) By March 27, 1987 for generators who generate more than 100, but less than 1000 kg of waste in a calendar month and treat, store, or dispose of these wastes on-site? Yes _____ No <input checked="" type="checkbox"/> N/A _____		<input checked="" type="checkbox"/>		

Area	Class	90 Day FUI Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No		
OTH	1			<p>Section 703.151: Application by New HWM Facilities</p> <p>For a new HWM facility, has the facility complied with the requirements of this section? Specifically, has the facility submitted Part A and Part B of the permit application 180 days before physical construction has commenced?</p> <p>Yes _____ No _____</p> <p>Is the facility only operating with a RCRA permit?</p> <p>Yes _____ No _____</p> <p>NOTE: This violation should be cited in the CIL only after receiving approval from headquarters.</p>			✓	Not a new facility
OTH	1			<p>Section 703.152: Amended Part A Application</p> <p>Has the owner or operator of a HWM facility with interim status filed an amended Part A permit application with the Agency:</p> <p>1) No later than the effective date of revised regulations under 35 Ill. Adm. Code 721, Identification and Listing of Hazardous Waste, listing or identifying additional hazardous waste which the HWM facility is handling?</p> <p>Yes _____ No _____ N/A _____</p> <p>2) As necessary to comply with the provisions of Section 703.155, Changes During Interim Status?</p> <p>Yes _____ No _____ N/A _____</p> <p>NOTE: The owner or operator of a facility who fails to comply with the updating requirements of this section does not receive interim status as to the wastes not covered by duly filed Part A applications.</p>			✓	Facility does not have interim status

Area	Class	90 Day F.U. Req	Key Lit	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No		
OTH	1			<p>Section 703.154: Prohibitions During Interim Status</p> <p>During interim status, has the facility refrained from:</p> <p>a - Treating, storing or disposing of hazardous waste not specified in Part A of the permit application? Yes _____ No _____</p> <p>b - Employing processes not specified in Part A of the permit application? Yes _____ No _____</p> <p>c - Exceeding the design capacities specified in Part A of the permit application? Yes _____ No _____</p>			✓	Facility does not have interim status
OTH	I			<p>Section 703.155: Changes During Interim Status</p> <p>NOTE: Section 703.155(a), (b) and (c) reiterate in more detail the requirement that a HWM facility submit and, in the case of (b) and (c) that the Agency approve, amendments to the Part A permit application prior to the facility conducting the activity or receiving new hazardous waste. A "No" answer to any of the questions under Section 703.154 means the facility is also in apparent non-compliance with this section.</p> <p>d Did the owner or operator submit a revised Part A permit application not later than 90 days prior to changes in operational control or ownership of the HWM facility? Yes _____ No _____ N/A ✓</p>			✓	Facility does not have interim status

Area	Class	90 Day F U Req	Key Ltr		Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec	Yes		No			
OTH	1				PART 725 INTERIM STATUS STANDARDS FOR OWNERS AND OPERATORS OF HAZARDOUS WASTE TREATMENT, STORAGE AND DISPOSAL FACILITIES Subpart A: General Provisions Section 725.101: Purpose, Scope and Applicability Does the facility qualify for any of the exemptions under Section 725.101(c)? Yes _____ No <input checked="" type="checkbox"/> <u>NOTE:</u> If "Yes", explain in narrative. d Has the firm managed hazardous waste with the following hazardous waste numbers: F020, F021, F022, F023, F026 or F027 in compliance with the requirements of 725.101(d)? Yes _____ No <input checked="" type="checkbox"/>				

TSD-A-1

Area	Class	90 Day Full Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No		
OTH	1			PART 725 INTERIM STATUS STANDARDS FOR OWNERS AND OPERATORS OF HAZARDOUS WASTE TREATMENT, STORAGE AND DISPOSAL FACILITIES Subpart B: General Facility Standards				
				Section 725.111: USEPA Identification Number Has the facility obtained a USEPA identification number?	✓			
OTH	1			Section 725.112: Required Notices a Has the owner or operator of a facility that has arranged to receive hazardous waste from a foreign source notified the Regional Administrator, in writing, at least four weeks in advance of the date that the waste is expected to arrive at the facility? Yes _____ No _____ N/A _____			✓	
				b Before transferring ownership or operation of a facility during its operating life, or of a disposal facility during the post-closure care period, did the owner or operator notify the new owner or operator, in writing, of the requirements of 35 Ill. Adm. Code 703, 703 and 725? Yes _____ No _____ N/A _____				
OTH	1			Section 725.113: General Waste Analysis a1 Has the owner or operator of the facility obtained a detailed chemical analysis of each waste prior to its treatment, storage or disposal? Yes _____ No <input checked="" type="checkbox"/>			✓	

TSD-B-1

Area	Class	90 Day F U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No	
			Sub Sec		Yes	No			
			a1	Does the analysis contain all the information which must be known to treat, store or dispose of the waste in accordance with this Part? Yes _____ No _____				No analysis performed skip to subsection b.	
			a3	Has the analysis been repeated: A) When the operator is notified or has reason to believe that the process generating the hazardous waste has changed? Yes _____ No _____ N/A _____ B) By off-site facilities, when the results of the inspection required in Section 725.113(a)(4) indicate that the hazardous waste received at the facility does not match the waste designated on the accompanying manifest or shipping paper? Yes _____ No _____ N/A _____					
			a4	Has the owner or operator of an off-site facility apparently inspected each hazardous waste movement received at the facility to determine whether it matches the identity of the waste specified on the accompanying manifest or shipping paper? Yes _____ No _____ N/A _____					
			b	Has the owner or operator developed a written analysis plan? Yes _____ No <input checked="" type="checkbox"/>					No written analysis plan
				NOTE: If "No", skip to 725.114. Is the written waste analysis plan available at the facility? Yes _____ No _____					Page B-3 deleted

TSD-B-2

Area	Class	90 Day F U Req	Key Ltr		Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec			Yes	No		
					<p>6) The methods which will be used to meet the additional analysis requirements for specific waste management methods as specified in Sections:</p> <ul style="list-style-type: none"> - 725.293 (Tanks); - 725.325 (Surface Impoundments); - 725.352 (Waste Piles); - 725.373 (Land Treatment); - 725.414 (Incinerators); - 725.475 (Thermal Treatment); - 725.502 (Chem. Phys. Bio. Treat.) <p>Yes _____ No _____ N/A _____</p> <p>NOTE: Circle the specific waste management methods being employed.</p> <p>c For off-site facilities, does the plan:</p> <p>1) Describe the procedures which will be used to determine the identity of each movement of waste managed at the facility? Yes _____ No _____ N/A _____</p> <p>2) Describe the sampling methods which will be used to obtain a representative sample of the waste to be identified, if the identification method includes sampling? Yes _____ No _____ N/A _____</p> <p>Section 725.114: Security</p> <p>Does the facility qualify for the exemption to the requirement to provide security provided in Section 725.114(a)? Yes _____ No <input checked="" type="checkbox"/></p>				
OTH	1	X					<input checked="" type="checkbox"/>		

TSD-B-4

Area	Class	90 Day F U Req	Key Ltr	Requirement	In Apparent Compliance		Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No		
				<p>Does a non-exempt facility have either:</p> <p>b 1) A 24-hour surveillance system which continuously monitors and controls entry into the active portion of the facility? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p style="text-align: center;">OR</p> <p>b 2) An artificial or natural barrier which completely surrounds the active portion of the facility and a means to control entry at all times thru the gate(s) or other entries to the active portion of the facility? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>c Does a non-exempt facility have a sign, legible from a distance of at least 25 feet, with the words "Danger - Unauthorized Personnel Keep Out" at each entrance to the active portion of the facility and at other locations in sufficient numbers to be seen from any approach to the active portion? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>NOTE: Existing signs with legends other than the one above may be used if the legend on the sign indicates only authorized personnel are allowed to enter the active portion and that entry onto the active portion can be dangerous.</p>				

TSD-B-5

Area	Class	90 Day F U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No		
OTH	2			Section 725.115: General Inspection Requirements		<input checked="" type="checkbox"/>		
			a	Does the owner or operator inspect the facility for malfunctions, deterioration, operator errors and discharges which are causing or may lead to:				
				1) Release of hazardous waste or hazardous waste constituents to the environment; or a threat to human health? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>				
			a	Does the owner or operator conduct these inspections often enough to identify problems in time to correct them before they harm human health or the environment? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>				
			b1	Has the owner or operator developed a written schedule for inspecting all monitoring equipment, safety and emergency equipment, security devices and operating and structural equipment important to preventing, detecting or responding to environmental or human health hazards? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>				
			b2	Is the written schedule at the facility? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>				
			b3	Does the schedule identify the types of problems which are to be looked for during the inspection? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>				
			b4	Does the schedule specify at least the following minimum inspection frequency: - Daily inspections of areas subject to spills? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>				

TSD-8-6

Area	Class	90 Day F U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec		yes	No		
				<ul style="list-style-type: none"> - The items and frequencies, where applicable, called for in Sections: <ul style="list-style-type: none"> - 725.274 (Containers); - 725.294 (Tanks); - 725.326 (Surface Impoundments); - 725.447 (Incinerators); - 725.477 (Thermal Treatment); - 725.503 (Chem. Phys. Bio. Treat.) <p>Yes ____ No <input checked="" type="checkbox"/> N/A ____</p> <p>NOTE: Circle the applicable section.</p> <p>c Has the owner or operator remedied any deterioration or malfunction of equipment or structures which the inspections reveal on a schedule which ensures that the problem does not lead to an environmental or human health hazard? Yes <input checked="" type="checkbox"/> No ____</p> <p>c Where a hazard is imminent or has already occurred, has the owner or operator taken immediate action to resolve the problem? Yes ____ No ____ N/A <input checked="" type="checkbox"/></p> <p>d Does the owner or operator record the results of inspections in a log or summary? Yes ____ No <input checked="" type="checkbox"/></p> <p>d Does the inspection record include:</p> <ul style="list-style-type: none"> - The date and time of the inspection? Yes ____ No <input checked="" type="checkbox"/> - The name of the inspector? Yes ____ No <input checked="" type="checkbox"/> 				

TSD-B-7

Area	Class	90 Day F U Req	Key Ltr		Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub	Sec		Yes	No		
OTH	2				<p>- A notation of the observations made? Yes _____ No <input checked="" type="checkbox"/></p> <p>- The date and nature of any type of corrective action? Yes _____ No <input checked="" type="checkbox"/> N/A _____</p> <p>Section 725.116: Personnel Training</p> <p>Does the facility have a training program? Yes _____ No <input checked="" type="checkbox"/></p> <p>NOTE: If "No", skip to Section 725.117, Page TSD-B-10.</p> <p>a1 Have facility personnel who are involved with hazardous waste management successfully completed a program of classroom or on-the-job training that teaches them to perform their duties in a way that ensures the facility's compliance with the requirements of this Part? Yes _____ No _____</p> <p>Is the training program formalized, i.e., written down? Yes _____ No _____</p> <p>a2 Is the program directed by a person who has been trained in hazardous waste management procedures? Yes _____ No _____</p> <p>a3 Does the program cover, at a minimum:</p> <p>A) Procedures for using, inspecting, repairing and replacing facility emergency and monitoring equipment? Yes _____ No _____ N/A _____</p>				
						<input checked="" type="checkbox"/>		Also a 722.134(a) violation.	
									Skip to page TSD-B-10

TSD-B-8

Area	Class	90 Day F U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No		
OTH	1	X		2) A written job description for each job position above, to include the requisite skill, education or other qualifications and duties of personnel assigned to each position? Yes _____ No _____				
				3) A written description of the type and amount of both initial and continuing training that will be given to each person holding a position dealing with hazardous waste management? Yes _____ No _____				
				4) Records to document that the training or job experience have been given to and completed by personnel dealing with hazardous waste management? Yes _____ No _____				
			e	Is the facility maintaining training records of former employees who were involved in hazardous waste management for a period of at least three years? Yes _____ No _____ N/A _____				
				Section 725.117: General Requirements for Ignitable, Reactive or Incompatible Wastes	✓			
			a	Are ignitable and reactive wastes protected from and separated from sources of ignition and reaction? Yes <u>✓</u> No _____				
			a	Are smoking and open flames restricted to specially designated areas when ignitable or reactive waste is being handled? Yes <u>✓</u> No _____				

TSD-8-10

Area	Class	90 Day F U Req	Key	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No		
			a	Are "No Smoking" signs posted whenever there is a hazard from ignitable or reactive waste? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>				
			b	Is the treatment, storage or disposal of ignitable or reactive waste and the mixture or comingling of incompatible wastes and materials being done so that it does not: <ul style="list-style-type: none"> 1) Generate extreme heat or pressure, fire, or explosion or violent reaction? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> 2) Produce uncontrolled toxic mists, fumes, dusts or gases in sufficient quantities to threaten human health? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> 3) Produce uncontrolled flammable fumes or gases in sufficient quantities to pose a risk of fire or explosion? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> 4) Damage the structural integrity of the device or facility containing the waste? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> 5) Through other like means threaten human health or the environment? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> 				

TSD-B-11

Area	Class	90 Day F U Reg	Key Ltr		Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec	Yes		No			
					<p>Section 725.118: Location Standards</p> <p>Has the facility placed hazardous waste in a salt dome, salt bed formation, underground mine or cave after July 11, 1986?</p> <p>Yes _____ No _____ N/A <input checked="" type="checkbox"/></p> <p>NOTE: A "Yes" answer is a violation of the location standard.</p>			<input checked="" type="checkbox"/>	

TSO-B-12

Area	Class	90 Day F U Req	Key Ltr		Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec	Yes		No			
OTH	1	X			PART 725 INTERIM STATUS STANDARDS FOR OWNERS AND OPERATORS OF HAZARDOUS WASTE TREATMENT, STORAGE AND DISPOSAL FACILITIES Subpart C: Preparedness and Prevention Section 725.131: Maintenance and Operation of Facility Is the facility being maintained and operated to minimize the possibility of a fire, explosion or any unplanned and sudden or non-sudden release of hazardous waste or hazardous waste constituents to: <ul style="list-style-type: none"> - Air; - Soil; or - Surface water, which would threaten human health or the environment? Yes _____ No _____	✓			
OTH	1	X			Section 725.132: Required Equipment Is the facility equipped with the following, unless none of the hazards posed by waste handled at the facility could require a particular kind of equipment: a - An internal communications or alarm system capable of providing immediate emergency instructions? Yes <u>✓</u> No _____ N/A _____ b - A device such as a telephone (immediately available at the scene of operations) capable of summoning emergency assistance from local police or fire departments or State or local emergency response teams? Yes <u>✓</u> No _____ N/A _____	✓			

TSD-C-1

Area	Class	90 Day F U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No		
OTH	1	X	c	- Portable fire extinguishers, fire control equipment, spill control equipment and decontamination equipment? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		
			d	- Water at adequate volume and pressure to supply water hose streams or foam producing equipment or automatic sprinklers or water spray systems? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>				
				NOTE: Any "N/A" answers must be explained in the Remarks column. Section 725.133: Testing and Maintenance of Equipment Where required, is the facility testing and maintaining, as necessary, to assure proper operation in time of emergency: <ul style="list-style-type: none"> - Communications/alarm systems? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> - Fire protection equipment? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> - Spill control equipment? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> - Decontamination equipment? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> NOTE: Any "N/A" answer must be explained in the Comments.	<input checked="" type="checkbox"/>	<input type="checkbox"/>		

TSD-C-2

Article	Class	90 Day F U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No		
OTH	1	X		Section 725.134: Access to Communications or Alarm Systems				St. Clair Pakwell runs on 3 shifts, always more than 1 person present when the facility is operating.
			a	Do all personnel involved in handling hazardous waste have immediate access to an internal alarm or emergency communication device, either directly or thru visual or voice contact with another employee, unless not required under Section 725.132? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>				
OTH	1	X	b	If there is ever just one employee on the premises while the facility is operating, does he have immediate access to a device, such as a telephone, capable of summoning external emergency assistance, unless such a device is not required under Section 725.132? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>				
				Section 725.135: Required Aisle Space	<input checked="" type="checkbox"/>			
OTH	2			Is the owner or operator maintaining sufficient aisle space to allow the unobstructed movement of personnel, fire equipment and decontamination equipment to any area of the facility?				
			a	Section 725.137: Arrangements with Local Authorities Has the owner or operator made or attempted to make the following arrangements as appropriate for the type of waste handled at his facility and the potential need for the services of these organizations:		<input checked="" type="checkbox"/>		

TSD-C-3

Area	Class	90 Day F U Req	Key		Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Ltr	Sub Sec		Yes	No		
					<p>1) Arrangements to familiarize police and fire departments and emergency response teams with the layout of the facility, properties of hazardous wastes handled at the facility and associated hazards, places where personnel would normally be working, entrances to roads inside the facility and possible evacuation routes? Yes _____ No <input checked="" type="checkbox"/> N/A _____</p> <p>2) Where more than one police or fire department might respond to an emergency, has one been designated as the primary emergency authority with the others agreeing to provide support to the primary emergency authority? Yes _____ No _____ N/A <input checked="" type="checkbox"/></p> <p>3) Agreements with State emergency response teams, emergency response contractors and equipment suppliers? Yes _____ No _____ N/A <input checked="" type="checkbox"/></p> <p>4) Arrangements to familiarize local hospitals with the properties of hazardous waste handled at the facility and the types of injuries or illnesses which could result from fires, explosions or releases at the facility? Yes _____ No <input checked="" type="checkbox"/> N/A _____</p> <p>NOTE: Any "N/A" answer must be explained in the Comments.</p>				<p>No arrangements made</p> <p>No state emergency response team contractors not required</p> <p>No attempt to make arrangements.</p>
			b		<p>Has the owner or operator documented, in the operating record, refusal of State or local authorities to enter into any or all of the above arrangements? Yes _____ No _____ N/A <input checked="" type="checkbox"/></p>				

TSD-C-4

Area	Class	90 Day F U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec		yes	No		
OTH	1			PART 725 INTERIM STATUS STANDARDS FOR OWNERS AND OPERATORS OF HAZARDOUS WASTE TREATMENT, STORAGE AND DISPOSAL FACILITIES Subpart D: Contingency Plan and Emergency Procedures				
				Section 725.151: Purpose and Implementation of Contingency Plan		✓		
			a	Is a plan available? Yes _____ No <u>✓</u>				
OTH	2			NOTE: If the answer is "No", skip to 725.155.				
			a	Is the plan designed to minimize hazards to human health or the environment from fires, explosions or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil, or surface waters? Yes _____ No _____				
			b	Have the provisions of the plan been carried out immediately whenever there was a fire, explosion or release of hazardous waste constituents which could threaten human health or the environment? Yes _____ No _____ N/A _____				
OTH				Section 725.152: Content of Contingency Plan				
			a	Does the plan describe the actions facility personnel must take to comply with Sections 725.151 and 725.156 in response to:				
				1) Fires? Yes _____ No _____ 2) Explosions? Yes _____ No _____				<i>TSD-D-2 and D-3 deleted.</i>

TSD-D-1

Area	Class	90 Day F U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No		
OTH	2			<p>725.154: Amendment of Contingency Plan</p> <p>Has the contingency plan been reviewed and, if necessary, amended whenever:</p> <p>a 1) Applicable regulations are revised? Yes _____ No _____</p> <p>b 2) The plan fails in an emergency? Yes _____ No _____ N/A _____</p> <p>c 3) The facility changes - in its design, construction, operation, maintenance or other circumstances - in a way that materially increases the potential for fires, explosions, or releases of hazardous waste or hazardous waste constituents or changes the response necessary in an emergency? Yes _____ No _____ N/A _____</p> <p>d 4) The list of emergency coordinators changes? Yes _____ No _____</p> <p>e 5) The list of emergency equipment changes? Yes _____ No _____</p>				
OTH	2			<p>Section 725.155: Emergency Coordinator</p> <p>Is there an emergency coordinator on-site or on-call at all times? Yes <input checked="" type="checkbox"/> No _____</p>				

TSD-D-4

Area	Class	90 Day F U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No		
OTH	1/2			<p>Is there an emergency coordinator familiar with all aspects of the contingency plan, all operations and activities at the facility, the location and characteristics of the wastes handled, the location of all records in the facility and the facility layout?</p> <p>Yes _____ No <input checked="" type="checkbox"/></p> <p>Does the coordinator have the authority to commit the resources to carry out the contingency plan?</p> <p>Yes <input checked="" type="checkbox"/> No _____</p> <p>Section 725.156: Emergency Procedures</p> <p>Has the facility had a release, fire or explosion?</p> <p>Yes _____ No <input checked="" type="checkbox"/></p> <p>NOTE: If the answer is "Yes", explain in detail the incident and how the facility did or did not follow the procedures described in this section. Review the requirements while completing the explanation. If the company failed to meet one or more of the requirements, check "No" in the Apparent Compliance column.</p>				there is no contingency plan
						<input checked="" type="checkbox"/>		

TSD-D-5

Area	Class	90 Day Ftl Req	Key Ltr	Requirement	In Apparent Compliance		Not Applicable	Remarks or Comment No	
			Sub Sec		Yes	No			
MAN	1			PART 725 INTERIM STATUS STANDARDS FOR OWNERS AND OPERATORS OF HAZARDOUS WASTE TREATMENT, STORAGE AND DISPOSAL FACILITIES Subpart E: Manifest System, Recordkeeping and Reporting Section 725.171: Use of Manifest System Does the facility accept waste from off-site? Yes _____ No <input checked="" type="checkbox"/>			<input checked="" type="checkbox"/>		
				NOTE: If the answer is "Yes", complete this section. If the answer is "No", check "N/A" and skip to 725.173. For each manifest reviewed, did the facility:					
			a1	1) Sign and date each copy to certify that the hazardous waste covered by the manifest was received? Yes _____ No _____					
			a2	2) Note any significant discrepancies in the manifest or each copy of the manifest? Yes _____ No _____ N/A _____					
			a3	3) Immediately give one copy of the completed manifest to the transporter? Yes _____ No _____					
			a4	4) Within 30 days after delivery, send one copy of the manifest to the generator and one copy to the Agency? Yes _____ No _____					
		a5	5) Retain a copy of the manifest at the facility for a period of three years from the date of delivery of the waste? Yes _____ No _____				Page TSD-E-2 deleted		

TSD-E-1

Area	Class	90 Day F U Req	Key		Requirement	In Apparent Compliance		Not Applicable	Remarks or Comment No
			Ltr	Sub Sec		Yes	No		
OTH	2				Section 725.173: Operating Record		<input checked="" type="checkbox"/>		
			a		Does the owner or operator have a written operating record at the facility? Yes _____ No <input checked="" type="checkbox"/>				
			b		Is the information in the operating record being maintained until closure of the facility? Yes _____ No <input checked="" type="checkbox"/>				
			b		Does the operating record contain the following information:				
					1) A description of and quantity of each hazardous waste received at the TSD facility (whether from on or off-site generation)? Yes _____ No <input checked="" type="checkbox"/> 2) A record of the method(s) and date(s) of its treatment, storage, or disposal as required by Appendix I? Yes _____ No <input checked="" type="checkbox"/> 3) The location of each hazardous waste within the facility? Yes _____ No <input checked="" type="checkbox"/> 4) The quantity of each hazardous waste at each location within the facility? Yes _____ No <input checked="" type="checkbox"/> 5) For disposal facilities, a map recording the location and quantity of hazardous waste in each cell or disposal area? Yes _____ No <input checked="" type="checkbox"/> N/A _____				

TSD-E-3

Area	Class	90 Day F U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No		
				<p>6) A cross reference by manifest number to location and quantity of hazardous waste? Yes _____ No <input checked="" type="checkbox"/> N/A _____</p> <p>7) Records and results of waste analyses and trial test performed as specified in Sections:</p> <ul style="list-style-type: none"> - 725.113 (Gen. Waste Analysis)? Yes _____ No <input checked="" type="checkbox"/> - 725.293 (Tanks)? Yes _____ No _____ N/A <input checked="" type="checkbox"/> - 725.325 (Surface Improvements)? Yes _____ No _____ N/A <input checked="" type="checkbox"/> - 725.352 (Waste Piles)? Yes _____ No _____ N/A <input checked="" type="checkbox"/> - 725.373 (Land Treatment)? Yes _____ No _____ N/A <input checked="" type="checkbox"/> - 725.441 (Incinerators)? Yes _____ No _____ N/A <input checked="" type="checkbox"/> - 725.475 (Thermal Treatment)? Yes _____ No _____ N/A <input checked="" type="checkbox"/> - 725.502 (Chem., Phys., Bio. Treatment)? Yes _____ No _____ N/A <input checked="" type="checkbox"/> <p>8) Summary reports and details of all incidents that require the implementation of the contingency plan as specified in Section 725.156(j)? Yes _____ No _____ N/A <input checked="" type="checkbox"/></p>				

TSD-E-4

Area	Class	90 Day F U Req	Key Ltr		Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec			Yes	No		
					<p>9) Records and results of inspections as required by Section 725.115(d)? Yes _____ No <u>✓</u></p> <p>NOTE: The above information on inspection records need only be kept for three years. This period would automatically be extended during any unresolved enforcement action.</p> <p>10) Monitoring, testing or analytical data where required by Sections:</p> <ul style="list-style-type: none"> - 725.190 (G.W. Monitoring)? Yes _____ No _____ N/A <u>✓</u> - 725.194 (G.W. Monitoring)? Yes _____ No _____ N/A <u>✓</u> - 725.376 (Land Treatment)? Yes _____ No _____ N/A <u>✓</u> - 725.378 (Land Treatment)? Yes _____ No _____ N/A <u>✓</u> - 735.380(d)(1) (Land Treatment)? Yes _____ No _____ N/A <u>✓</u> - 725.447 (Incinerators)? Yes _____ No _____ N/A <u>✓</u> - 725.477 (Thermal Treatment)? Yes _____ No _____ N/A <u>✓</u> <p>NOTE: Data required under 725.194 must be kept throughout the post-closure period.</p>				

TSD-E-5

Area	Class	90 Day F U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No		
			Sub Sec		Yes	No				
OTH	2			11) All closure cost estimates required by Section 725.242? Yes _____ No <input checked="" type="checkbox"/> N/A _____						
				12) All post-closure cost estimates for disposal facilities required for Section 725.244? Yes _____ No _____ N/A <input checked="" type="checkbox"/>						
				Section 725.174: Availability, Retention and Disposition of Records						<input checked="" type="checkbox"/>
			a	During the inspection, were all records including plans required under this Part furnished upon request and made available at all reasonable times for inspection as required by this Section? Yes <input checked="" type="checkbox"/> No _____ N/A _____						
			c	Upon closure of a waste disposal facility did the owner or operator submit a copy of the record of waste disposal location(s) and quantities to: <ul style="list-style-type: none"> - The Agency? Yes _____ No _____ N/A <input checked="" type="checkbox"/> - The local land authority? Yes _____ No _____ N/A <input checked="" type="checkbox"/> 						
			b	Are all required records being maintained and retained during the course of any unresolved enforcement action or as requested by the Director? Yes _____ No _____ N/A <input checked="" type="checkbox"/>						

TSD-E-6

Area	Class	90 Day F U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No		
OTH	2			Section 725.175: Annual Report Has the owner or operator prepared and submitted a copy of a facility annual report, supplied by the Agency, to the Agency by March 1 of each year for the preceding calendar year?	<input checked="" type="checkbox"/>			
OTH	1			Section 725.176: Unmanifested Waste Report Does the facility accept hazardous waste from off-site? Yes _____ No <input checked="" type="checkbox"/> <p>NOTE: If the answer is "Yes", complete this section. If the answer is "No", check "N/A" and skip to 725.177.</p> Has the facility accepted hazardous waste from an off-site source for treatment, storage or disposal without an accompanying manifest or shipping paper? Yes _____ No _____ <p>Was the hazardous waste accepted without the manifest or shipping paper exempt from the manifesting requirement by 35 Ill. Adm. Code 721.105? Yes _____ No _____</p> <p>NOTE: If the answer to both the above questions is "Yes", check "N/A". If the answer to the first question is "Yes" and the second "No", answer the following questions:</p> Did the owner or operator complete an unmanifested waste report to include the information required in Section 725.176(a) thru (g)? Yes _____ No _____			<input checked="" type="checkbox"/>	

TSD-E-7

Area	Class	90 Day F U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No		
			Sub Sec		Yes	No				
OTH	2			<p>Did the owner or operator submit the unmanifested waste report to the Agency within 15 days of receiving the waste? Yes ____ No ____</p>						
				<p>Section 725.177: Additional Reports</p> <p>Has the owner or operator submitted to the Agency, as required, reports concerning:</p>						
			a	<p>1) Releases, fires, explosions as specified in Section 725.156? Yes ____ No ____ N/A <input checked="" type="checkbox"/></p>						
			b	<p>2) Groundwater contamination and monitoring data as specified in Sections 725.193 and 725.194? Yes ____ No ____ N/A <input checked="" type="checkbox"/></p>						
			c	<p>3) Facility closure as specified in Section 725.215? Yes ____ No ____ N/A <input checked="" type="checkbox"/></p>						

Area	Class	90 Day F U Req	Key Ltr		Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub	Sec		Yes	No		
CLO	1				PART 725 INTERIM STATUS STANDARDS FOR OWNERS AND OPERATORS OF HAZARDOUS WASTE TREATMENT, STORAGE AND DISPOSAL FACILITIES Subparts G and H: Closure, Post-Closure and Financial Requirements				<i>No closure plan for drum storage area.</i>
					Section 725.212: Closure Plan a Was the most current facility closure plan available during the inspection? Yes _____ No <input checked="" type="checkbox"/> <u>✓</u> Was the closure plan submitted to the Agency within the time frames specified below: <ul style="list-style-type: none"> - At least 180 days prior to the date closure of the first surface impoundment, waste pile, land treatment or landfill unit was (is) expected to begin? Yes _____ No _____ N/A <input checked="" type="checkbox"/> <u>✓</u> - At least 180 days prior to the date of final closure of a facility with surface impoundment(s), waste pile(s), land treatment or landfill unit(s)? Yes _____ No _____ N/A <input checked="" type="checkbox"/> <u>✓</u> - At least 45 days prior to the date of final closure of a facility with any tank(s), container storage or incinerator unit(s)? Yes _____ No _____ N/A <input checked="" type="checkbox"/> <u>✓</u> - At least 60 days prior to the date closure is expected to begin at a facility with a surface impoundment, waste pile, landfill or land treatment unit which also has an approved closure plan? Yes _____ No _____ N/A <input checked="" type="checkbox"/> <u>✓</u> 		<input checked="" type="checkbox"/> <u>✓</u>		

TSD-G/H-1

Area	Class	90 Day F U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No		
CLO	1			<ul style="list-style-type: none"> - No later than 15 days after termination of interim status (unless a full operating permit was issued simultaneously)? Yes ___ No ___ N/A <input checked="" type="checkbox"/> - No later than 15 days after issuance of a judicial decree or Board Order to cease receiving hazardous waste or close? Yes ___ No ___ N/A <input checked="" type="checkbox"/> <p>Section 725.218: Post-Closure Plan</p> <p>a Was the most current facility post-closure plan available during the inspection? Yes ___ No <input checked="" type="checkbox"/></p> <p>Was the post-closure plan submitted to the Agency within the time frames established in this sub-section? Yes ___ No ___ N/A <input checked="" type="checkbox"/></p>				No post closure plan
FIN	1			<p>Section 725.242: Cost Estimate for Closure</p> <p>Has the facility prepared a written estimate of the cost of closing the facility?</p>				No cost estimate for drum storage area.
FIN	1			<p>Section 725.244: Cost Estimate for Post-Closure Care</p> <p>Has the facility prepared a written estimate of the annual cost of post-closure monitoring and maintenance of the facility?</p> <p><u>NOTE:</u> If no post-closure plan, mark "N/A".</p>			<input checked="" type="checkbox"/>	

TSD-G/H-2

Area	Class	90 Day F U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No		
OTH	1	X		PART 725 INTERIM STATUS STANDARDS FOR OWNERS AND OPERATORS OF HAZARDOUS WASTE TREATMENT, STORAGE AND DISPOSAL FACILITIES Subpart I: Use and Management of Container				✓ No leaky containers found.
				Section 725.271: Condition of Containers Has the owner or operator transferred the hazardous waste in leaking container or containers which are not in good condition or managing the waste in some other way that complies with the requirements of this Part?				
OTH	1	X		Section 725.272: Compatibility of Waste with Containers Is the owner or operator using containers made of or lined with materials which will not react with and are otherwise compatible with the hazardous waste to be stored so that the ability of the container to contain the waste is not impaired?	✓			
OTH	1	X		Section 725.273: Management of Containers	✓			
			a	Are containers of hazardous waste always closed during storage? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>				
			b	Are containers of hazardous waste being opened, handled or stored in manner which will prevent the rupture of the container or prevent it from leaking? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>				
OTH	2			Section 725.274: Inspections Is the owner or operator inspecting areas where the containers are stored at least weekly, looking for leaks and for deterioration caused by corrosion or other factors? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	✓			

TSD-I-1

Area	Class	90 Day F L Req	Key Ltr	Requirement	In Apparent Compliance		Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No		
OTH	1	X		<p>NOTE: Any evidence of leakage may be a reason to answer "No" to the above question, even if there are inspection records that indicate that inspections are being done. Review the responses in Section 725.115, General Inspection Requirements, the frequency of inspections, the date of the last inspection, etc. to determine if inspections are actually being done.</p> <p>Section 725.276: Special Requirements for Ignitable or Reactive Wastes</p> <p>Are containers holding ignitable or reactive waste located at least 50 feet from the property line?</p>	✓			
				<p>Section 725.277: Special Requirements for Incompatible Wastes</p> <p>Is the owner complying with the requirements concerning the management of incompatible wastes or incompatible wastes and materials contained in this Section?</p>	✓			

TSD-I-2

Area	Class	90 Day F U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No		
OTH	2			<p>PART 725 INTERIM STATUS STANDARDS FOR OWNERS AND OPERATORS OF HAZARDOUS WASTE TREATMENT, STORAGE AND DISPOSAL FACILITIES Subpart J: Tank Systems</p> <p>Section 725.290: Applicability</p> <p>Does the facility store or treat hazardous waste in tanks? Yes _____ No <input checked="" type="checkbox"/></p> <p>If "No", skip Subpart J.</p> <p>NOTE: Tanks or sump pits that serve as part of a secondary containment system to collect or contain releases are not subject to Subpart J requirements.</p> <p>Will the waste stored in the tanks fail the filter test and are the tanks located inside a building with an impermeable floor? Yes _____ No _____</p> <p>NOTE: Failing the filter test means that the waste contains free liquids.</p> <p>Section 725.291: Assessment of Existing Tank Systems</p>				
			a	<p>For tanks not protected by a secondary containment system, is an independent, certified written assessment available? Yes _____ No _____</p> <p>NOTE: Except as provided in Subsection (c) of 725.291, certified assessment must be available by 1/12/88.</p>				No disposal or treatment systems, remainder of TSDs deleted.

TSD-J-1

A-4 RCRA LAND DISPOSAL RESTRICTION INSPECTION CHECKLIST

RCRA LAND DISPOSAL RESTRICTIONS INSPECTION

I. General Information

Facility: St. Clair Parkwell
 U.S. EPA ID No.: ILT180010472
 Street: 120 S. 25th Ave
 City: Bellwood State: IL Zip: 60104
 Telephone: (312) 276-6400

Inspection Date: 6/4/91 Time: 9:20 (am/pm)

Weather Conditions: Sunny 70°-75°

	<u>Name</u>	<u>Agency/Title</u>	<u>Telephone</u>
Inspectors:	<u>Ross Crittenden</u>	<u>USEPA/Contractor</u>	<u>(312) 466-0222</u>
	<u>Darlene Terrell</u>	<u>USEPA/Contractor</u>	<u>(301) 417-9800</u>
	<u>Jeffrey R. Smith</u>	<u>USEPA/Contractor</u>	<u>(312) 466-0222</u>
Facility Representatives:	<u>John RaeVasi</u>	<u>Field Container/Environmental and Safety Coordinator</u>	<u>(708) 437-1700</u>
	<u>Tom Nichold</u>	<u>St. Clair Parkwell/Maintenance</u>	<u>(312) 276-6400</u>

See Appendix B to determine which of the following LDR waste categories the facility manages:

	<u>Generate</u>	<u>Transport</u>	<u>Treat</u>	<u>Store</u>	<u>Dispose</u>
F001-F005 Solvents	<u>✓</u>	<u>_____</u>	<u>_____</u>	<u>✓</u>	<u>_____</u>
F020-F023 and F026-F028	<u>_____</u>	<u>_____</u>	<u>_____</u>	<u>_____</u>	<u>_____</u>
California List*	<u>_____</u>	<u>_____</u>	<u>_____</u>	<u>_____</u>	<u>_____</u>
First Third [40 CFR 268.10]	<u>_____</u>	<u>_____</u>	<u>_____</u>	<u>_____</u>	<u>_____</u>
Second Third [40 CFR 268.11]	<u>_____</u>	<u>_____</u>	<u>_____</u>	<u>_____</u>	<u>_____</u>
Third Third [40 CFR 268.12]	<u>✓</u>	<u>_____</u>	<u>_____</u>	<u>✓</u>	<u>_____</u>

* See Appendix A

RCRA LAND DISPOSAL RESTRICTIONS INSPECTION

II. WASTE IDENTIFICATION

A. List waste codes which the facility handles in each of the following LDR categories*:

1. F001 through F005 spent solvents:
F002, F003
2. F020-F023 and F026-F028 dioxin-containing wastes:

3. California List Wastes (See Appendix A):

4. First Third Wastes [40 CFR 268.10]:

5. Second Third Wastes [40 CFR 268.11]:

6. Third Third Wastes [40 CFR 268.12]**:
D001

*See Appendix B.

** Note: Effective 09/25/90, large quantity generators and TSDs are required to use the toxicity characteristic leaching procedure (TCLP) instead of the extraction procedure (EP) for determining the toxicity characteristic (TC). Small quantity generators must comply with this new requirement by 03/29/91. Wastes which exhibit TC, but do not exhibit EP, will be considered "newly identified" wastes. They will be regulated under 40 CFR Part 268 only after they are evaluated by U.S. EPA, even if they are characteristic for a constituent previously covered under the EP toxicity characteristic (55 FR 22531).

B. Waste Code Determination

1. Have all wastes been correctly identified for purposes of compliance with 40 CFR Part 268?

Yes ___ No X

If no, list below:

<u>Assigned Classification</u>	<u>Correct Classification</u>
<u>F002</u>	<u>F002, F003</u>
_____	_____
_____	_____
_____	_____

*Areas of concern include: California List/waste categories with more stringent treatment standards; listed/characteristic; multi-source/single-source leachate; P and U waste codes/F and K wastes; and waste code carry through principle.

Comments: _____

2. Have both the listed and characteristic waste code been assigned, where a listed waste exhibits a characteristic? [40 CFR 268.9(a)]

Yes ☐ No ☒ NA ☐

Comments _____

3. Has multi-source leachate been assigned the F039 waste code? * [40 CFR 261.31]

Yes ☐ No ☐ NA ☒

*Leachate derived exclusively from F020-F023 and/or F026-F028 dioxin wastes retains the individual waste codes.

If yes, was single-source leachate combined to form multi-source leachate? [55 FR 22623]

Yes ☐ No ☐

Comments _____

C. Does the facility handle the following wastes (national capacity variances)?

1. F001-F005 contaminated soil and debris resulting from a CERCLA response action or a RCRA corrective action (expires - 11/08/90). [40 CFR 268.30(c)]

Yes ☐ No ☒ List _____

2. Dioxin contaminated soil and debris resulting from a CERCLA response action or a RCRA corrective action (expires - 11/08/90). [40 CFR 268.31(b)]

Yes ☐ No ☒ List _____

3. California list contaminated soil and debris resulting from a CERCLA response action or a RCRA corrective action (expires - 11/08/90). [40 CFR 268.32(d)(2)]

Yes ☐ No ☒ List _____

4. K048-K052 petroleum wastes (nonwastewaters; expires - 11/08/90). [40 CFR 268.35(b)]

Yes ☐ No ☒ List _____

5. Soil and debris contaminated with wastes that had treatment standards based on incineration set in the Second Third rule - F010, F024, K009, K010, K011, K013, K014, K023, K027, K028, K029, K038, K039, K040, K043, K093, K094, K095, K096, K113, K114, K115, K116, P039, P040, P041, P043, P044, P062, P071, P085, P089, P094, P097, P109, P111, U028, U058, U069, U087, U088, U102, U107, U190, U221, U223, U235 (expires - 06/08/91). [40 CFR 268.34(d)]

Yes ☐ No ☒ List _____

6. Soil and debris contaminated with wastes that had treatment standards set in the Third Third rule based on incineration, mercury retorting, or vitrification. See Appendix A; (expires - 05/08/92). [40 CFR 268.35(e)]
 Yes ☐ No ☒ List _____
7. The following nonwastewaters - F039, K031, K084, K101, K102, K106, P010, P011, P012, P036, P038, P065, P087, P092, U136, U151. (expires -05/08/92). [40 CFR 268.35(c)]
 Yes ☐ No ☒ List _____
8. The following wastes identified as hazardous based on a characteristic alone: D004 (nonwastewaters), D008 (lead materials stored before secondary smelting), D009 (nonwastewaters) (expires - 05/08/92). [40 CFR 268.35(c)]
 Yes ☐ No ☒ List _____
9. Inorganic solid debris as defined in 40 CFR 268.2(g)*; includes chromium refractory bricks carrying EPA Hazardous Waste Nos. K048-K052 (expires - 05/08/92). [40 CFR 268.35(c)]
 Yes ☐ No ☒ List _____
- *Note: Incorrect reference [40 CFR 268.2(a)(7)] in Third Third rule.
10. RCRA hazardous wastes that contain naturally occurring radioactive materials (expires - 05/08/92). [40 CFR 268.35(c)]
 Yes ☐ No ☒ List _____
11. Wastes listed in 40 CFR 268.10, 268.11, and 268.12 that are mixed radioactive/hazardous wastes (expires - 05/08/92)*. [40 CFR 268.35(d)]
 Yes ☐ No ☒ List _____

*Note: 40 CFR 268.10 and 268.11 wastes incorrectly omitted from this variance in the Third Third rule.

RCRA LAND DISPOSAL RESTRICTION INSPECTION

III. GENERATOR REQUIREMENTS

A. Treatability Group/Treatment Standard Identification*

*Note: This information is generally available on LDR notifications. If not, waste profile data and other documentation should be checked.

1. F001-F005 Spent Solvent Wastes: Does the generator correctly determine the appropriate treatability group/treatment standard for each F-solvent?

Yes ☒ No ☐ NA ☐

If available, list each waste code and check the correct treatability group.

Waste Code	Wastewater*	Nonwastewater
<u>F002</u>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<u>F003</u>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<u> </u>	<input type="checkbox"/>	<input type="checkbox"/>

*Less than 1% by weight total organic carbon (TOC), or less than 1% by weight total F001-F005 solvent constituents listed in 40 CFR 268.41, Table CCWE. [40 CFR 268.2(f)(1)]

Comments _____

2. F020-F023 and F026-F028 Dioxin Wastes: Does the generator correctly determine the appropriate treatability group/treatment standard for each dioxin waste?

Yes ☐ No ☐ NA ☒

If yes, list each waste code and check the correct treatability group.

Waste Code	Wastewater*	Nonwastewater
<u> </u>	<input type="checkbox"/>	<input type="checkbox"/>
<u> </u>	<input type="checkbox"/>	<input type="checkbox"/>
<u> </u>	<input type="checkbox"/>	<input type="checkbox"/>

Comments _____

*Less than 1% TOC by weight and less than 1% total suspended solids (TSS) by weight. [40 CFR 268.2(f)]

3. First, Second, and Third Third Wastes:

- a. Does the generator correctly determine the appropriate treatability group/treatment standard for each waste?

Yes ☐ No ☒ NA ☐

If available, list each waste code and check the correct treatability group:

Waste Code Subcategory Wastewater* Nonwastewater

<u>D001</u>	_____	_____	<u>X</u>
_____	_____	_____	_____
_____	_____	_____	_____

* Less than 1% TOC by weight and less than 1% total suspended solids (TSS) with the following exceptions: K011, K013, and K014 wastewaters - less than 5% by weight TOC and less than 1% by weight TSS; K103 and K104 wastewaters - less than 4% by weight TOC and less than 1% by weight TSS. (40 CFR 268.2(f)(2) and (3))

Comments D001 not assigned to F002 Wastestream.

- b. Do the assigned treatment standards for listed wastes cover constituents that may cause the waste to exhibit any characteristics? [40 CFR 268.9 (b)]

Yes _____ No X NA _____

- c. Does the generator specify alternative treatment standards for lab packs?*

Yes _____ No _____ NA X

*Use of the alternative treatment standards is not required. (55 FR 22629)

If yes, do lab packs only contain the following wastes? [40 CFR 268.42(c)(2)]

_____ Organometallics: 40 Part 268, Appendix IV constituents

_____ Organics: 40 CFR Part 268, Appendix V constituents

*Unregulated wastes and hazardous wastes which meet treatment standards may be commingled in the appropriate Appendix IV and V lab pack. (55 FR 22629)

- d. Does the generator specify alternative treatment standards for F039 multi-source leachate?*

Yes _____ No _____ NA X

*Use of the alternative treatment standards is required. (55 FR 22619)

4. California List Wastes: Has the generator correctly identified the treatability group and treatment standard/prohibition level for the following wastes? [55 FR 22675]

- a. Liquid hazardous wastes containing PCBs ≥ 50 ppm

Yes _____ No _____ NA X

If yes, check the appropriate treatability group:

_____ 50 to 500 ppm PCBs

_____ ≥ 500 ppm PCBs

- b. Listed or characteristic wastes containing $\geq 1,000$ mg/l (liquids) or mg/kg (non-liquids) HOCs, which are not listed or characterized by the HOC content

Yes ☐ No ☐ NA ☒

If yes, check the appropriate treatability group:

☐ Dilute HOC wastewater (1,000 mg/l to 10,000 mg/l HOCs)
☐ All other HOCs greater than or equal to the prohibition level of 1,000 mg/l (liquids) or mg/kg (non-liquids)

- c. Liquid hazardous wastes that exhibit a characteristic and also contain ≥ 134 mg/l nickel and/or ≥ 130 mg/l thallium

Yes ☐ No ☐ NA ☒

5. National Capacity Variance Wastes: If a wastestream contains a mixture of wastes, and a variance only applies to some of the waste codes, has the generator identified all applicable treatment standards and California List prohibitions? (See Appendix A.)

Yes ☐ No ☐ NA ☒

If California List prohibitions apply, complete the following table for each waste code, noting the date on which the national capacity variance expires.

Waste Code	Cal List Applicability	Expiration Date
<input type="text"/>	<input type="text"/>	<input type="text"/>
<input type="text"/>	<input type="text"/>	<input type="text"/>
<input type="text"/>	<input type="text"/>	<input type="text"/>

Comments

6. Treatment standards expressed as required technologies: Has the generator specified an alternative method to that required in 40 CFR 268.42?

Yes ☐ No ☐ NA ☒

If yes, list the waste code, the technology specified in 40 CFR 268.42, the alternative method, and documentation of approval. [40 CFR 268.42(b)]

Waste Code	Required Technology	Alternative Method	Approval
<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>
<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>
<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>

Comments

7. Does the generator mix restricted wastes with different treatment standards for a constituent of concern?

Yes ☐ No ☒

If yes, did the generator select the most stringent treatment standards?
[40 CFR 268.41(b) and 268.43(b)]

Yes ___ No ___

Comments _____

B. Waste Analysis

1. Does the generator determine whether restricted wastes exceed treatment standards/prohibition levels at the point of generation?* [268.7(a)]

Yes ___ No X

*Note: This determination may be made at the point of disposal if the waste only has a prohibition level in effect.

If no, does the generator ship all restricted wastes as not meeting treatment standards?

Yes X No ___ (Go to 3.)

Comments _____

2. Which of the following methods does the generator use to make this determination (more than one may apply)?*

*Note: A "No" answer to applicable questions b. through d. does not necessarily constitute a violation. However, knowledge of waste is rarely adequate if a generator certifies that treatment standard criteria have been met.

- a. Knowledge of waste:

Yes X No ___

If yes, list the wastes for which applied knowledge was used and describe the basis of determination. Attach documentation. [40 CFR 268.7(a)(5)]

FOO2 FOO3/POO1. No documentation available. Knowledge of ink formulation and solvents used in determination of wastes.

- b. TCLP*: Are wastes with treatment standards specified in 40 CFR 268.41 analyzed using TCLP?*** (BDAT*** = stabilization/immobilization technology)

Yes ___ No X NA ___

*TCLP = Toxicity Characteristic Leaching Procedure [40 CFR Part 268, Appendix I, EPA Test Method 1311]

**See Appendix C for exceptions.

***BDAT = best demonstrated available technology. See Appendix A.

If yes, list the wastes for which TCLP was used and provide the date of last test, the frequency of testing, and note any problems. Attach test results. [40 CFR 268.7(a)(5)]

- c. Total constituent analysis: Are wastes with treatment standards specified in 268.43 analyzed using total constituent analysis?* (BDAT = destruction/removal technology)

Yes ☐ No ☐ NA ☒

*See Appendix C for exceptions.

If yes, list the wastes for which total constituent analysis was used and provide the date of last test, the frequency of testing, and note any problems. Attach test results. [40 CFR 268.7(a)(5)]

- d. PFLT*: Was PFLT used to determine if California List constituents were contained in *liquid* hazardous waste?

Yes ☐ No ☐ NA ☒

*PFLT = Paint Filter Liquids Test (Test Method 9095, EPA Publication No. SW-846)

If yes, list the wastes for which PFLT was used and provide the date of last test, the frequency of testing, and note any problems. Attach test results. [40 CFR 268.7(a)(5)]

3. Does the generator treat restricted wastes in 90-day tanks or containers regulated under 40 CFR 262.34 (permissible in some states)?

Yes ☐ No ☒ (If No, go to 4.)

Does the generator treat the wastes to meet appropriate treatment standards/prohibition levels?

Yes ☐ No ☐

If yes, has the generator prepared a waste analysis plan detailing the frequency of testing to be conducted? 40 CFR 268.7(a)(4)]

Yes ☐ No ☐ (If No, go to 4.)

Does the plan fulfill the following? [40 CFR 268.7(a)(4)(i)]

- ☐ Based on a detailed chemical and physical analysis of a representative sample
☐ Contains information necessary to treat the wastes in accordance with 40 CFR Part 268 requirements

Has the plan been filed with the Regional Administrator (return receipt, Federal Express slip, etc. required for verification)? [40 CFR 268.7(a)(4)(ii)]

Yes ☐ No ☐

Comments _____

4. Dilution Prohibition [40 CFR 268.3]:

- a. Does the generator mix prohibited* wastes with different treatment standards?

*See Appendix E for distinction between restricted and prohibited wastes.

Yes ☐ No ☒ (If No, go to b.)

List the wastes _____

Are the wastes amenable to the same type of treatment? [55 FR 22666]

Yes ☐ No ☐

Comments _____

- b. Does the generator dilute prohibited wastes to meet treatment standard criteria, or render them non-hazardous? [55 FR 22665-22666]

Yes ☐ No ☒ (If No, go to c.)

Check appropriate category:

- ☐ Dilutes to meet treatment standards
☐ Dilutes to render waste non-hazardous

Do the wastes fall into the following categories? (Check if appropriate.) [40 CFR 268.3(b)]

- ☐ Managed in treatment systems regulated under the Clean Water Act
☐ Non-toxic* characteristic wastes
☐ Treatment standard specified in 40 CFR 268.41 or 268.43

*Non-toxic = 0001(except high TOC nonwastewaters), 0002, and 0003(except cyanides and sulfides). [55 FR 22666]

If the wastes do not fall into the above categories, briefly describe the conditions under which they were diluted.

- c. Based on an assessment of points a. and b., and any other relevant circumstances, does the generator dilute prohibited wastes as a substitute for adequate treatment? [40 CFR 268.3(a)]

Yes ☐ No ☒

Comments _____

- Yes No NA X

1. On-Site Management

- Yes ☒ No ☐

* Small quantity generator = generator of greater than or equal to 100 kg/mo. but less than 1,000 kg/mo. hazardous waste, or less than 1 kg/mo. acutely hazardous waste

Comments: There was some drum (Fuel) on site for 99 days. 9 days past
10 days

- Yes _____ No _____ NA X

- Yes No NA ☒

*This applies to both concentration based treatment standards specified in 40 CFR 268.41 and 268.43, and to some 40 CFR 268.42 required methods which result in treatment below the characteristic level. See Appendix D.

Yes Y No _____ (If No, go to 3.)

<u>Waste Code</u>	<u>Receiving Facility</u>
<u>FO03</u>	<u>Industrial Fuels Recovery</u>
<u>FO02</u>	<u>Chemical Waste Management</u> Chemical Services

Does the generator provide a notification to the treatment or storage facility?
[40 CFR 268.7(a)(1)]

Yes X No (If No, go to 3.)

If the generator specifies alternative treatment standards for lab packs, is the certification required in 40 CFR 268.7(a)(7) or (8) included with the notification?

Yes No NA X

b. Is a notification sent with each waste shipment?

Yes X No

If no, is the waste subject to a tolling agreement pursuant to 262.20(e) (small quantity generator only)?

Yes _____ No _____ (If No, go to 3.)

List waste codes and subsequent handler with whom a contractual tolling agreement is held.

<u>Waste Code</u>	<u>Subsequent Handler</u>
001	001
002	002
003	003
004	004
005	005
006	006
007	007
008	008
009	009
010	010
011	011
012	012
013	013
014	014
015	015
016	016
017	017
018	018
019	019
020	020
021	021
022	022
023	023
024	024
025	025
026	026
027	027
028	028
029	029
030	030
031	031
032	032
033	033
034	034
035	035
036	036
037	037
038	038
039	039
040	040
041	041
042	042
043	043
044	044
045	045
046	046
047	047
048	048
049	049
050	050
051	051
052	052
053	053
054	054
055	055
056	056
057	057
058	058
059	059
060	060
061	061
062	062
063	063
064	064
065	065
066	066
067	067
068	068
069	069
070	070
071	071
072	072
073	073
074	074
075	075
076	076
077	077
078	078
079	079
080	080
081	081
082	082
083	083
084	084
085	085
086	086
087	087
088	088
089	089
090	090
091	091
092	092
093	093
094	094
095	095
096	096
097	097
098	098
099	099

Did the small quantity generator provide a notification to the receiving facility with the first waste shipment subject to the tolling agreement? [40 CFR 268.7(a)(9)]

Yes _____ No _____

3. Off-Site Management: Waste Meets Treatment Standards

a. Does the generator ship waste that meets treatment standards/prohibition levels to an off-site disposal facility?

Yes No X (If No, go to 4.)

Identify waste code(s) and off-site disposal facilities:

<u>Waste Code</u>	<u>Receiving Facility</u>
-------------------	---------------------------

Does the generator provide a notification and a certification to the disposal facility? [40 CFR 268.7(a)(2)(i) and 268.7(a)(2)(ii)]?

Yes _____ No _____ (If No, go to d.)

- b. Are a notification and a certification sent with each waste shipment?

Yes ☐ No ☐

If no, is the waste subject to a tolling agreement pursuant to 262.20(e) (small quantity generator only)?

Yes ☐ No ☐ (If No, go to c.)

List waste codes and subsequent handler with whom a contractual tolling agreement is held.

<u>Waste Code</u>	<u>Subsequent Handler</u>
_____	_____
_____	_____
_____	_____

Did the small quantity generator provide a notification and a certification to the receiving facility with the first waste shipment subject to the tolling agreement? [40 CFR 268.7(a)(9)]

Yes ☐ No ☐

- c. Are characteristic wastes which have been rendered non-hazardous (in a RCRA exempt unit) shipped to a Subtitle D facility?

Yes ☐ No ☐ NA ☐ (If No or NA, go to 4.)

Complete the following table:

<u>Waste Code</u>	<u>Receiving Facility</u>
_____	_____
_____	_____
_____	_____

Are a notification and a certification for each shipment sent to the Regional Administrator or authorized State? [40 CFR 268.9(d)(1) and 268.7(b)(5)]?

Yes ☐ No ☐

4. Off-Site Management: Wastes Subject to Variances, Extensions, or Petitions

- a. Does the generator ship wastes to a treatment, storage, or disposal facility which are subject to a national capacity variance (40 CFR Part 268, Subpart C), or case-by-case extension (40 CFR 268.5)?

Yes ☐ No ☒ (If No, go to 5.)

Complete the following table:

<u>Waste Code</u>	<u>Receiving Facility</u>
_____	_____
_____	_____
_____	_____

Does the generator provide notification to the off-site receiving facility that the waste is not prohibited from land disposal? [268.7(a)(3)]

Yes ☐ No ☐

b. Is a notification sent with each waste shipment?

Yes ☐ No ☐

If no, is the waste subject to a tolling agreement pursuant to 262.20(e) (small quantity generator only)?

Yes ☐ No ☐ (If No, go to 5.)

List waste codes and subsequent handler with whom a contractual tolling agreement is held.

<u>Waste Code</u>	<u>Subsequent Handler</u>
<input type="text"/>	<input type="text"/>
<input type="text"/>	<input type="text"/>
<input type="text"/>	<input type="text"/>

Did the small quantity generator provide a notification to the receiving facility with the first waste shipment subject to the tolling agreement? [40 CFR 268.7(a)(9)]

Yes ☐ No ☐

5. Records Retention

Does the generator retain on site copies of all notifications, certifications, and other relevant documents for a period of 5 years? [40 CFR 268.7(a)(6)]

Yes ☐ No ☒

Are copies of relevant tolling agreements, along with the LDR notification and/or certification, kept on site for at least 3 years after expiration or termination of the agreement? [40 CFR 268.9]

Yes ☐ No ☐ NA ☒

Do LDR documents reflect proper management of wastes previously covered under expired national capacity variances, case by case extensions and the soft hammer provision*?

Yes ☐ No ☐ NA ☒

*See Appendix B. Note that the soft hammer provision expired as of 05/08/90. Soft hammer wastes which had treatment standards established in the Third Third rule were granted a minimum 90-day national capacity variance to 08/08/90.

Comments

D. Treatment Using RCRA 40 CFR Parts 264 and 265 Exempt Units or Processes

1. Are restricted wastes treated in RCRA exempt units (i.e., boilers, furnaces, distillation units, wastewater treatment tanks, elementary neutralization, etc.)?

Yes No ~~X~~ (If No, do not complete this section.)

List types of waste treatment units and processes:

<u>Waste Code</u>	<u>Type of Treatment</u>	<u>Treatment Units and Processes</u>
_____	_____	_____
_____	_____	_____
_____	_____	_____

2. Are treatment residuals generated from these units?

Yes No

Comments _____

3. Are residuals further treated, stored for greater than 90/180 days, or disposed on site?

Yes _____ No _____ NA _____

(If yes, the TSD checklist must also be completed.)

E. Additional Comments, Concerns, or Issues Not Addressed in the Checklist:

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A. Waste Analysis [40 CFR 268.7(b), 264.13, and 265.13]

- | | | | |
|---------------------------------------|------------------------------|--|--|
| F001-F005 Spent Solvents | Yes <input type="checkbox"/> | No <input checked="" type="checkbox"/> | NA <input type="checkbox"/> |
| F020-F023 and F026-F028 Dioxins | Yes <input type="checkbox"/> | No <input type="checkbox"/> | NA <input checked="" type="checkbox"/> |
| California List Wastes | Yes <input type="checkbox"/> | No <input type="checkbox"/> | NA <input checked="" type="checkbox"/> |
| First, Second, and Third Third Wastes | Yes <input type="checkbox"/> | No <input checked="" type="checkbox"/> | NA <input type="checkbox"/> |

2. Has the waste analysis plan been revised to address F039 multi-source leachate?

Yes _____ No _____ NA ✓

3. What date was the waste analysis plan last revised? / / *NA*

4. Does analytical data contain all the information required to treat, store, or dispose of restricted wastes? [40 CFR 264.13(a)(1) and 265.13(a)(1)]

Yes _____ No ☒

If **yes**, which of the following are sources of analytical data? (More than one may apply.):

Generator provides data

Facility performs analyses in on-site laboratory

Facility contracts analyses at off-site laboratory

If the generator provides data, does the facility provide corroborative testing? [40 CFR 264.13(a)(2) and 265.13(a)(2)]

Yes No NA ✓

If analyses are conducted off site, identify lab: _____

- a. Are wastes with treatment standards specified in 40 CFR 268.41 analyzed using the toxicity characteristic leaching procedure (TCLP)?* (BDAT** = stabilization/immobilization technology) [40 CFR 268.7(b)(1)]

Yes _____ No ✓ NA _____

*See Appendix C for exceptions.

**BDAF = best demonstrated available technology. See Appendix A.

If yes, list the wastes for which TCLP was used and provide the date of last test, frequency of testing, and note any problems. Attach test results. [40 CFR 264.73 (b)(3) and 265.73(b)(3)]

- b. Are wastes with treatment standards specified in 40 CFR 268.43 analyzed using total constituent analysis?* (BDAT = destruction/removal technology) [40 CFR 268.7(b)(3)]

Yes ☐ No ☐ NA ☒

*See Appendix C for exceptions.

If yes, list the wastes for which total constituent analysis was used and provide the date of last test, frequency of testing, and note any problems. Attach test results. [40 CFR 264.73 (b)(3) and 265.73(b)(3)]

- c. Is the paint filter liquids test (PFLT) used to determine if California List wastes are contained in *liquid* hazardous waste? [40 CFR 268.32(i)]

Yes ☐ No ☐ NA ☒

If yes, list the wastes for which PELT was used and provide the date of last test, the frequency of testing, and note any problems. Attach test results. [40 CFR 264.73(b)(3) and 265.73(b)(3)]

B. Operating Record [40 CFR 264.73 and 265.73]

1. Does the operating record contain records and results of waste analyses performed as specified in 40 CFR 268.4 and/or 40 CFR 268.7(b)? [40 CFR 264.73(b)(3) and 265.73(b)(3)]

Yes ☐ No ☒

2. Does the operating record contain copies of LDR notifications and certifications?* [40 CFR 264.73(b)(11), (13), and (15) and 40 CFR 265.73(b)(11), (13), and (15)]

Yes ☐ No ☒

*Include both those received from generators, and those prepared for off-site shipments.

3. Does the operating record include appropriate documentation for restricted wastes which are managed wholly on site? [40 CFR 264.73(b)(12), (14), and (16) and 265.73(b)(12), (14), and (16)]

Yes ☐ No ☐ NA ☒

Does the documentation discussed in points 2. and 3. reflect proper historical management of wastes previously covered under expired national capacity variances, case by case extensions, and the soft hammer provision?*

Yes ___ No ___ NA ☒

*Note that the soft hammer provision expired as of 05/08/90. Soft hammer wastes which had treatment standards established in the Third Third rule were granted a minimum 90-day national capacity variance to 08/08/90.

C. Storage [40 CFR 268.50]

1. Are prohibited* wastes stored on site in containers?

Yes ___ No ☒ (If No, go to 2.)

*See Appendix E for distinction between restricted and prohibited wastes.

Are all containers clearly marked to identify the contents and date(s) entering storage? [40 CFR 268.50(a)(2)(i)]

Yes ___ No ___

Have wastes been stored for more than one year since the applicable LDR regulations went into effect?

Yes ___ No ___ (If No, go to 2.)

Can the facility show that such accumulation is necessary to facilitate property recovery, treatment, or disposal? [40 CFR 268.50 (c)]

Yes ___ No ___

If yes, state how: _____

2. Are prohibited wastes stored on site in tanks?

Yes ___ No ☒ (If No, go to 3.)

Are all tanks clearly marked with a description of the contents, the quantity of each hazardous waste received, and date each period of accumulation begins, or is such information recorded and maintained in the operating record? [40 CFR 268.50(a)(2)(ii)]

Yes ___ No ___

Have tanks been emptied at least once per year since the applicable LDR regulations went into effect?

Yes ___ No ___ (If Yes, go to 3.)

Can the facility show that such accumulation is necessary to facilitate proper recovery, treatment, or disposal? [40 CFR 268.50(c)]

Yes ___ No ___

If yes, state how: _____

3. Does the facility store liquid hazardous waste containing PCBs at concentrations greater than or equal to 50 ppm?

Yes ___ No ☒ (If No, go to D.)

Does the facility meet the TSCA criteria in 40 CFR 761.65(b)? [40 CFR 268.50(f)]

Yes ___ No ___

Have these wastes been stored for more than one year? [40 CFR 268.50(f)]

Yes ___ No ___

D. Treatment

1. Does the facility treat restricted wastes other than in surface impoundments?

Yes ___ No ☒ (If No, do not complete this section. Go to E.)

2. Are required technologies used to treat wastes which have treatment standards specified in 40 CFR 268.42? [40 CFR 268.40(b)]

Yes ___ No ___ NA ___ (If Yes or NA, go to 3.)

Was an alternative method approved?

Yes ___ No ___

List each waste code, the technology specified in 40 CFR 268.42, and the alternative method. Check if approval of the alternative method is documented. [40 CFR 268.42(b)]

<u>Waste Code</u>	<u>Required Technology</u>	<u>Alternative Method</u>	<u>Approval</u>
_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____

3. **Lab packs:** If alternative treatment standards are specified, are incinerator residues from lab packs containing D004, D005, D006, D007, D008, D010, and D011 treated in compliance with the subpart D treatment standards for these characteristic wastes? [40 CFR 268.42(c)(4)]

Yes ___ No ___ NA ___

Complete the following table:

<u>Waste Code</u>	<u>Receiving Facility</u>
_____	_____
_____	_____
_____	_____

Are appropriate generator notifications and certifications provided to the receiving facility with each waste shipment? [40 CFR 268.7(b)(6)]

Yes _____ No _____

E. Surface Impoundments [40 CFR 268.4]

1. Are restricted wastes placed in surface impoundments for treatment?

Yes _____ No ☒ (If No, do not complete this section. Go to E.)

List _____

2. Are evaporation or dilution the only recognizable treatment occurring in the surface impoundment? [40 CFR 268.3(a) and 268.4(b)]

Yes _____ No _____

Comments _____

3. Has the facility submitted to the Agency a waste analysis plan and certification of compliance with minimum technology requirements and ground-water monitoring requirements? [40 CFR 268.4(a)(4)]

Yes _____ No _____

4. If the minimum technology requirements have not been met, has a waiver been granted for that unit? [40 CFR 268.4(a)(3)(ii)]

Yes _____ No _____ NA _____

5. Are representative samples of sludge and supernatant from the surface impoundment tested separately, acceptably, and in accordance with the sampling frequency and analyses specified in the waste analysis plan? (Attach test results.) [40 CFR 268.4(a)(2)(i)]

Yes _____ No _____

6. Does the operating record adequately document the results of waste analyses performed in accordance with 40 CFR 268.4? [40 CFR 264.73(b)(3) and 265.73(b)(3)]

Yes _____ No _____

Comments _____

7. Do the treatment residues (sludges or liquids) exceed applicable treatment standards/prohibition levels?

Sludge Yes ☐ No ☐ Waste Code _____
 Supernatant Yes ☐ No ☐ Waste Code _____

Provide the frequency of analyses conducted on treatment residues:

8. If sludge residues exceed treatment standards/prohibition levels, are they removed on an annual basis? [40 CFR 268.4(a)(2)(ii)]

Yes ☐ No ☐ NA ☐

Comments _____

Are residues subsequently managed in another surface impoundment? [40 CFR 268.4(a)(2)(iii)]

Yes ☐ No ☐

9. If supernatant is determined to exceed treatment standards, is annual throughput greater than impoundment volume? [40 CFR 268.4(a)(2)(ii)]

Yes ☐ No ☐ NA ☐

Comments _____

F. Land Disposal

1. Are restricted wastes placed in or on the land in units such as landfills, surface impoundments*, waste piles, land treatment units, salt domes/beds, mines/caves, concrete vaults, or bunkers? [40 CFR 268.2(c)]

Yes ☐ No ☒ (If No, do not complete this section.)

*Note: Do not include surface impoundments addressed in E.

If yes, specify which units and what wastes each unit has received:

Unit	Waste
_____	_____
_____	_____
_____	_____

2. Does the facility, in accordance with an acceptable waste analysis plan, test prohibited wastes prior to land disposal to ensure that all applicable treatment standards and/or prohibition levels have been met? [40 CFR 268.7(c)(2)]

Yes ☐ No ☐

Comments _____

3. Does the facility test wastes to ensure that they do not exhibit any characteristics at the point of disposal?* [40 CFR 268.9(c)]

Yes ___ No ___ NA ___

*Note: A waste may exceed a characteristic level only if the treatment standard for that characteristic has been met.

4. Does the operating record adequately document the results of waste analyses performed in accordance with 40 CFR 268.7(c)? [40 CFR 264.73(b)(3) and 265.73(b)(3)]

Yes ___ No ___

If yes, at what frequency are analyses performed? _____

5. Does the facility land dispose of restricted wastes which are not prohibited?

Yes ___ No ___ (If No, go to 5.)

List waste codes in appropriate category below:

National Capacity Variance (40 CFR Part 268, Subpart C) _____

Case-By-Case Extension (40 CFR 268.5) _____

No-Migration Petition (40 CFR 268.6) _____

Treatment Standard Variance (40 CFR 268.44) _____

Does the operating record contain records of the quantities, date of placement, and a copy of the generator notification [40 CFR 268.7(a)(3)] for each shipment of restricted waste subject to a case-by case extension or no-migration petition? [40 CFR 264.73(b)(10) and 265.73(b)(10)]

Yes ___ No ___ NA ___

Do land disposal units receiving wastes covered by a national capacity variance or case-by-case extension meet the requirements in 40 CFR 268.5(h)(2)?

Yes ___ No ___ NA ___

If the facility has a case-by-case extension, is progress being made as described in reports to the Regional Administrator?

Yes ___ No ___ NA ___

6. Are restricted wastes placed in underground injection wells?

Yes ___ No ___ List _____

G. Other Wastestreams

1. Does the facility generate wastes other than residues from RCRA treatment units?

Yes ☒ No ☐ (If No, go to H.)

2. On-Site Management

- a. If characteristic wastes are treated in systems regulated under the Clean Water Act, have the following been documented: the determination of restriction, how restricted wastes are managed, and why wastes discharged pursuant to an NPDES permit are not prohibited (if applicable)? [55 FR 22662]

Yes ☐ No ☐ NA ☒

- b. If characteristic wastes are treated in RCRA exempt units to render them non-hazardous, are the wastes managed as restricted until 40 CFR Part 268 treatment standards are met?* [40 CFR 268.9(d)]

Yes ☐ No ☐ NA ☒

*This applies to both concentration based treatment standards specified in 40 CFR 268.41 and 268.43, and to some 40 CFR 268.42 required methods which result in treatment below the characteristic level. See Appendix D.

3. Off-Site Management: Waste Exceeds Treatment Standards

Are wastes that exceed treatment standards/prohibition levels shipped to an off-site treatment or storage facility?

Yes ☒ No ☐ (If No, go to 4.)

Identify wastes code(s) and off-site treatment or storage facilities to which wastes are shipped.

<u>Waste Code</u>	<u>Receiving Facility</u>
<u>F003</u>	<u>Industrial Fuels recovery</u>
<u>F002</u>	<u>Chemical Waste management chemical services</u>

Are LDR notifications provided for each shipment to the treatment or storage facility? [40 CFR 268.7(a)(1)]

Yes ☐ No ☒ (If No, go to 4.)

If alternative treatment standards are specified for lab packs, is the certification required in 40 CFR 268.7(a)(7) or (8) included with the notification?

Yes ___ No ___ NA ___

4. Off-Site Management: Wastes Meets Treatment Standards

- a. Are wastes that meet treatment standards/prohibition levels shipped to an off-site disposal facility?

Yes ___ No ☒ (If No, go to 5.)

Identify waste code(s) and off-site disposal facilities:

<u>Waste Code</u>	<u>Receiving Facility</u>
_____	_____
_____	_____
_____	_____

Are LDR notifications and certifications provided for each shipment to the disposal facility? [40 CFR 268.7(a)(2)(i) and 268.7(a)(2)(ii)]?

Yes ___ No ___ (If No, go to b.)

- b. Are characteristic wastes which have been rendered non-hazardous (in a RCRA exempt unit) shipped to a Subtitle D facility?

Yes ___ No ___ NA ___ (If No or NA, go to 5.)

Complete the following table:

<u>Waste Code</u>	<u>Receiving Facility</u>
_____	_____
_____	_____
_____	_____

Are a notification and a certification for each shipment sent to the Regional Administrator or authorized State? [40 CFR 268.9(d)(1) and 268.7(b)(5)]?

Yes ___ No ___

5. Dilution Prohibition [40 CFR 268.3]:

- a. Are prohibited* wastes with different treatment standards mixed?

*See Appendix E for distinction between restricted and prohibited wastes.

Yes ☐ No ☒ (If No, go to b.)

List the wastes _____

Are the wastes amenable to the same type of treatment? [55 FR 22666]

Yes ☐ No ☐

Comments _____

- b. Are prohibited wastes diluted to meet treatment standard criteria, or render them non-hazardous? [55 FR 22665-22666]

Yes ☐ No ☒ (If No, go to c.)

Check appropriate category:

☐ Dilutes to meet treatment standards☐ Dilutes to render waste non-hazardous

Do wastes fall into the following categories? (Check if appropriate.) [40 CFR 268.3(b)]

☐ Managed in treatment systems regulated under the Clean Water Act☐ Non-toxic* characteristic wastes☐ Treatment standard specified in 40 CFR 268.41 or 268.43

*Non-toxic = D001 (except high TOC nonwastewaters), D002, and D003 (except cyanides and sulfides). [55 FR 22666]

If the wastes do not fall into the above categories, briefly describe the conditions under which they were diluted.

- c. Based on an assessment of points a. and b., and any other relevant circumstances, are prohibited wastes diluted as a substitute for adequate treatment? [40 CFR 268.3(a)]

Yes ☐ No ☒

Comments _____

H. Additional Comments, Concerns, or Issues Not Addressed in the Checklist:

None



ST CLAIR
PAKWELL

August 18, 1980

Ms. Margie Lukas
EPA Region 5
RCRA Activities
P.O. Box 7861
Chicago, IL. 60680

Dear Ms. Lukas:

We handle ignitable waste generating 750 gal. per month.

William Kaehler,
Plant Manager

St. Clair Mfg. Corp.
120 25th Ave.
Bellwood, IL. 60104

Type of Hazardous Waste
Activity: Generate

Characteristic: Ignitable

Ref: ILB-064413016

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents and that based on my inquiry of those individuals immediately responsible for obtaining the information I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information including the possibility of fines and imprisonment.

Very truly yours,

ST. CLAIR PAKWELL

William E. Kaehler

William Kaehler
Plant Manager

WK:jlk

AUG 20 1980

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